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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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<i>In re:</i>	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Chapter 11
	:	Case No. 19-23649 (RDD)
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	

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**TWENTY-SIXTH MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD NOVEMBER 1, 2021 THROUGH NOVEMBER 30, 2021**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>November 1, 2021 through November 30, 2021</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$585,887.20 (80% of \$732,359.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$262.80 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-sixth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing November 1, 2021 through November 30, 2021 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$732,359.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$585,887.20.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$814.70. The blended hourly rate of paraprofessionals during the Application Period is \$278.24.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$262.80 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$262.80.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

#### **FILING AND SERVICE**

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$585,887.20 (80% of \$732,359.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$262.80 (100%), for a total amount of \$586,150.00 for the Application Period.

Dated: February 4, 2022  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

*/s/ Kami E. Quinn*

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*Counsel for the Ad Hoc Committee of  
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**Exhibit A**  
**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A001	Asset Analysis & Recovery	8.3	\$6,465.50
A004	Case Administration	8.1	\$1,590.00
A006	Employment / Fee Applications	1.9	\$551.00
A009	Meetings / Communications with AHC & Creditors	6.8	\$7,792.50
A015	Non-Working Travel (Billed @ 50%)	5.1	\$1,785.00
A019	Plan of Reorganization / Disclosure Statement	252.6	\$217,813.50
A020	Insurance Adversary Proceeding	771.6	\$496,361.50
		<b>1,054.4</b>	<b>\$732,359.00</b>

**Exhibit B**  
**Summary of Compensation by Professional**

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	44.3	\$75,310.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	71.5	\$100,100.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	71.5	\$96,525.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	5.7	\$6,270.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	99.8	\$79,840.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	55.0	\$39,875.00
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020 U.S. Court of Appeals for the Federal Circuit - 2021	\$700.00	2.2	\$1,540.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00 \$350.00 <sup>2</sup>	66.1 5.1	\$46,270.00 \$1,785.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	74.7	\$50,422.50

<sup>2</sup> Non-working travel is billed @ 50% of regular hourly rate

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Heather Frazier	Associate / District of Columbia - 2017	\$675.00	15.5	\$10,462.50
Meredith Neely	Associate / Commonwealth of Virginia – 2018 District of Columbia - 2018	\$625.00	3.1	\$1,937.50
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	80.5	\$46,287.50
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	80.9	\$46,517.50
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	51.5	\$25,750.00
Christian Carey	Associate / District of Columbia – 2020	\$425.00	76.6	\$32,555.00
John Grgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365.00	14.3	\$5,219.50
Ifenanya Agwu	Law Clerk	\$200.00	8.1	\$1,620.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425.00	31.0	\$13,175.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2018	\$375.00	7.1	\$2,662.50
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	6.9	\$2,277.00
Lauren Fastenau	Paralegal – Joined firm in 2019	\$315.00	37.5	\$11,812.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$315.00	14.4	\$4,536.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	79.3	\$18,239.00
David Lopez	Paralegal – Joined firm in 2019	\$230.00	3.4	\$782.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	23.8	\$5,474.00
Patrick McGlinchey	Paralegal – Joined firm in 2020	\$230.00	3.9	\$897.00
Michael Lloyd	Project Assistant – Joined firm in 2021	\$195.00	5.6	\$1,092.00
Carmen Turner	Project Assistant – Joined firm in 2021	\$195.00	13.2	\$2,574.00
Peggy Holland	Billing Specialist – Joined firm in 2002	\$290.00	1.9	\$551.00
	<b>Totals</b>		<b>1,054.4</b>	<b>\$732,359.00</b>
	<b>Attorney Blended Rate</b>	<b>\$814.70</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$278.24</b>		

**Exhibit C**  
**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Depositions / Transcripts	\$262.80
<b>Total</b>	<b>\$262.80</b>

**Exhibit D**

**Time and Expense Detail**



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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

February 4, 2022  
Invoice Number: 11325399  
Client Number: 1599  
Tax ID: 52-2283869

**FOR PROFESSIONAL SERVICES RENDERED through November 30, 2021**

**Re: Ad Hoc Committee (Purdue)**

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	732,359.00	262.80	732,621.80
<b>Total</b>	<b>732,359.00</b>	<b>262.80</b>	<b>732,621.80</b>
TOTAL FEES			\$ 732,359.00
TOTAL EXPENSES			<u>\$ 262.80</u>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 732,621.80</b>

**FOR PROFESSIONAL SERVICES RENDERED through November 30, 2021****Purdue Bankruptcy****A001: Asset Analysis & Recovery**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Gilbert, S.	11/01/21	Confer with team re insurance strategy.	.30	510.00
Hudson, J.	11/01/21	Confer with team re next steps for insurance recovery.	.30	217.50
Wolf, D.	11/01/21	Confer with S. Gilbert, J. Hudson, S. Sraders, E. Kaminsky, and others re insurance recovery strategy.	.30	210.00
Sraders, S.	11/01/21	Confer with team re insurance recovery strategy and next steps.	.30	172.50
Kaminsky, E.	11/01/21	Confer with team re litigation status and strategy.	.30	150.00
Hudson, J.	11/04/21	Analyze next steps for insurance recovery.	.10	72.50
Hudson, J.	11/05/21	Communicate with S. Gilbert re next steps for insurance recovery.	.20	145.00
Martinez, S.	11/05/21	Review databases re new insurance-related materials.	.20	63.00
Hudson, J.	11/08/21	Confer with team re insurance recovery status and strategy.	.20	145.00
Grim, E.	11/08/21	Confer with team re insurance recovery strategy.	.20	140.00
Wolf, D.	11/08/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, E. Grim, S. Sraders, A. Gaske, and E. Kaminsky re insurance recovery strategy.	.20	140.00
Gaske, A.	11/08/21	Confer with team re insurance recovery strategy.	.20	115.00
Sraders, S.	11/08/21	Confer with team re strategy and recent developments.	.20	115.00
Kaminsky, E.	11/08/21	Confer with team re status and strategy.	.20	100.00
Hudson, J.	11/14/21	Analyze next steps for insurance recovery.	.40	290.00
Gilbert, S.	11/22/21	Analyze insurance recovery strategy.	.50	850.00
Hudson, J.	11/22/21	Confer with AHC working group and co-counsel re insurance settlement strategy.	.60	435.00
Hudson, J.	11/22/21	Analyze next steps for insurance recovery.	.10	72.50
Hudson, J.	11/24/21	Confer with claimant constituencies re potential insurance settlement approach.	.20	145.00
Hudson, J.	11/24/21	Review scope of coverage for individual insureds in connection with recovery strategy.	.10	72.50
Hudson, J.	11/24/21	Revise insurance settlement-related materials.	1.60	1,160.00

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Name	Date	Services	Hours	Amount
Hudson, J.	11/28/21	Revise insurance settlement-related materials.	.10	72.50
Hudson, J.	11/29/21	Revise template settlement demand letter and associated presentation for client meeting.	1.10	797.50
Sraders, S.	11/29/21	Confer with team re current status of bankruptcy and next steps.	.10	57.50
Hudson, J.	11/30/21	Review materials for insurance settlement strategy meeting with AHC working group.	.30	217.50
		<b>Project Total:</b>	<b>8.30</b>	<b>\$ 6,465.50</b>

#### A004: Case Administration

Name	Date	Services	Hours	Amount
Ogrey, S.	11/01/21	Review new/closed cases filed against Debtors.	.30	69.00
Turner, C.	11/01/21	Review court docket for recently filed insurance-related pleadings.	1.90	370.50
Turner, C.	11/04/21	Calendar upcoming hearings.	.80	156.00
Turner, C.	11/08/21	Review and organize insurance-related pleadings recently filed in case.	2.50	487.50
Turner, C.	11/15/21	Review and organize insurance-related pleadings recently filed in case.	1.50	292.50
Turner, C.	11/22/21	Review and organize recently filed insurance-related pleadings.	.50	97.50
Turner, C.	11/29/21	Review insurance-related pleadings recently filed.	.60	117.00
		<b>Project Total:</b>	<b>8.10</b>	<b>\$ 1,590.00</b>

#### A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	11/01/21	Draft September fee statement.	1.10	319.00
Holland, P.	11/11/21	Finalize September fee statement (0.7); communicate with US Trustee and Fee Examiner re same (0.1).	.80	232.00
		<b>Project Total:</b>	<b>1.90</b>	<b>\$ 551.00</b>

#### A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	11/03/21	Confer with J. Rice re strategy.	.50	850.00
Gilbert, S.	11/03/21	Confer with AHC re plan.	.80	1,360.00

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Name	Date	Services	Hours	Amount
Quinn, K.	11/03/21	Confer with Committee re status and strategy.	.80	880.00
Grim, E.	11/03/21	Confer with AHC re trust formation issues and status of appellate proceedings.	.80	560.00
Wolf, D.	11/03/21	Conference call with clients and co-counsel re trust formation and appellate strategy.	.80	560.00
Sraders, S.	11/03/21	Confer with AHC re current status of proceedings.	.80	460.00
Gilbert, S.	11/17/21	Confer with AHC re plan.	.40	680.00
Quinn, K.	11/17/21	Confer with Committee re trustees and upcoming hearing update.	.40	440.00
Hudson, J.	11/17/21	Confer with AHC client representative (J. Peacock) re settlement of insurance issues.	.10	72.50
Sraders, S.	11/17/21	Confer with AHC re recent developments and next steps.	.40	230.00
Gilbert, S.	11/18/21	Confer with working group re strategy.	1.00	1,700.00
<b>Project Total:</b>			<b>6.80</b>	<b>\$ 7,792.50</b>

#### A015: Non-Working Travel (Billed @ 50%)

Name	Date	Services	Hours	Amount
Wolf, D.	11/29/21	Travel from Washington, DC to New York, NY for appellate oral argument.	.60	210.00
Wolf, D.	11/30/21	Travel from New York, NY to Washington, DC after appeal hearing.	4.50	1,575.00
<b>Project Total:</b>			<b>5.10</b>	<b>\$ 1,785.00</b>

#### A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	11/01/21	Confer with D. Wolf re trust issues.	.50	850.00
Gilbert, S.	11/01/21	Confer with working group re NOAT TDP.	1.50	2,550.00
Gilbert, S.	11/01/21	Confer with NewCo Board re insurance issues.	1.60	2,720.00
Gilbert, S.	11/01/21	Confer with K. Eckstein re strategy.	1.00	1,700.00
Shore, R.	11/01/21	Review and revise insurance presentation for MDT Trustee.	1.40	1,890.00
Hudson, J.	11/01/21	Draft outline of insurance summary for MDT Trustee.	.20	145.00
Hudson, J.	11/01/21	Confirm insurers' agreement to public filing of policies attached to dissenting states' appellate brief.	.10	72.50

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Name	Date	Services	Hours	Amount
Wolf, D.	11/01/21	Review and revise insurance coverage summary memorandum.	.30	210.00
Wolf, D.	11/01/21	Review presentations and insurance policies re NewCo insurance procurement.	.20	140.00
Wolf, D.	11/01/21	Confer with S. Gilbert re establishment and oversight of MDT, NOAT and TAFT trusts.	.50	350.00
Wolf, D.	11/01/21	Confer with AHC and outside counsel re NOAT trust procedures.	1.50	1,050.00
Wolf, D.	11/01/21	Confer with NewCo Board, K. Eckstein, and S. Gilbert re D&O insurance.	1.60	1,120.00
Gilbert, S.	11/02/21	Confer with AHC working group re plan.	.60	1,020.00
Gilbert, S.	11/02/21	Confer with co-counsel re NOAT formation.	1.00	1,700.00
Quinn, K.	11/02/21	Review update re stay issue.	.10	110.00
Shore, R.	11/02/21	Review and revise insurance presentation for trust.	2.00	2,700.00
Hudson, J.	11/02/21	Confirm final sign-off on appellate sealing issue.	.10	72.50
Hudson, J.	11/02/21	Continue drafting outline of insurance summary for MDT Trustee.	.20	145.00
Wolf, D.	11/02/21	Confer with AHC and outside counsel re NOAT trust procedures.	.60	420.00
Leveridge, R.	11/02/21	Review communications with Debtors' counsel and insurer counsel re use of insurance policies in appellate papers.	.40	560.00
Shore, R.	11/03/21	Draft outline for insurance presentation.	5.00	6,750.00
Hudson, J.	11/03/21	Revise insurance summary for MDT Trustee.	2.40	1,740.00
Wolf, D.	11/03/21	Revise insurance coverage summary memorandum.	1.10	770.00
Gilbert, S.	11/04/21	Confer with AHC working group re plan.	.50	850.00
Shore, R.	11/04/21	Confer with MDT Trustee (J. Peacock), J. Hudson and D. Wolf re insurance coverage (2.2); revise presentation outline (0.9).	3.10	4,185.00
Hudson, J.	11/04/21	Confer with MDT Trustee (J. Peacock) re insurance coverage.	2.20	1,595.00
Hudson, J.	11/04/21	Revise insurance summary for MDT Trustee.	1.20	870.00
Hudson, J.	11/04/21	Outline views on next steps for insurance recovery presentations to client groups.	.20	145.00
Neely, M.	11/04/21	Confer with D. Wolf re trust formation and insurance procurement.	.30	187.50
Neely, M.	11/04/21	Confer with B. Kelly re trust formation status.	.10	62.50
Wolf, D.	11/04/21	Confer with M. Neely re status of trust formations and insurance procurement.	.30	210.00

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Name	Date	Services	Hours	Amount
Wolf, D.	11/04/21	Confer with J. Peacock and J. Hudson re insurance coverage summary memorandum.	2.20	1,540.00
Wolf, D.	11/04/21	Continue revising insurance coverage summary memorandum.	.40	280.00
Wolf, D.	11/04/21	Review D&O insurance policies and status of defense costs re same.	.50	350.00
Gilbert, S.	11/05/21	Confer with B. Kelly and D. Wolf re trust insurance.	.70	1,190.00
Gilbert, S.	11/05/21	Confer with working group re insurance briefing.	1.70	2,890.00
Gilbert, S.	11/05/21	Analyze NOAT issues.	.50	850.00
Gilbert, S.	11/05/21	Review insurance briefing for MDT.	1.00	1,700.00
Gilbert, S.	11/05/21	Confer with MDT trustees re insurance coverage.	1.00	1,700.00
Shore, R.	11/05/21	Confer with MDT Trustee (J. Peacock) re insurance coverage	2.80	3,780.00
Hudson, J.	11/05/21	Confer with MDT Trustee (J. Peacock) and D. Wolf re insurance coverage.	2.80	2,030.00
Wolf, D.	11/05/21	Confer with B. Kelly and S. Gilbert re trust formation and insurance placement.	.70	490.00
Wolf, D.	11/05/21	Confer with J. Peacock and J. Hudson re insurance coverage summary memorandum.	2.80	1,960.00
Wolf, D.	11/05/21	Revise trust agreements and supporting documents.	1.60	1,120.00
Wolf, D.	11/05/21	Review status of MDT shareholder insurance rights transfer.	.60	420.00
Wolf, D.	11/05/21	Confer with M. Leventhal, P. Jerdee, and D. Porat re MDT shareholder insurance rights.	.40	280.00
Gilbert, S.	11/06/21	Confer with working group re trusts and issues.	1.70	2,890.00
Wolf, D.	11/06/21	Revise trust agreements, trust distribution procedures, and supporting documents.	4.90	3,430.00
Wolf, D.	11/06/21	Confer with J. Peacock, R. Ringer, B. Kelly, and S. Gilbert re trust formations.	1.70	1,190.00
Gilbert, S.	11/08/21	Confer with K. Eckstein re strategy.	1.00	1,700.00
Rush, M.	11/08/21	Confer with team re claims submitted in bankruptcy.	1.40	945.00
Sraders, S.	11/08/21	Confer with J. Hudson, E. Kaminsky, and A. Gaske re flow chart re recovery under TDPs.	.20	115.00
Gilbert, S.	11/09/21	Attend hearing re stay pending appeal.	8.50	14,450.00
Hudson, J.	11/09/21	Revise outline for client presentation re denial of withdrawal of the reference.	.50	362.50
Neely, M.	11/09/21	Communicate with D. Wolf re NOAT Board book.	.10	62.50
Wolf, D.	11/09/21	Revise trust agreements, trust distribution procedures, and supporting documents.	.50	350.00

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February 4, 2022

Name	Date	Services	Hours	Amount
Sraders, S.	11/09/21	Review correspondence from C. Gange re non-debtor release prohibition act.	.10	57.50
Neely, M.	11/10/21	Finish summarizing indemnification, insurance, and exculpation provisions in NOAT agreement for board book presentation.	1.40	875.00
Wolf, D.	11/10/21	Continue revising trust agreements, trust distribution procedures, and supporting documents.	1.00	700.00
Neely, M.	11/11/21	Confer with N. Brotto, S. Toomey, M. Brown, B. Kelly, and D. Wolf re NOAT Trust indemnification and insurance.	.40	250.00
Wolf, D.	11/11/21	Continue revising trust agreements, trust distribution procedures, and supporting documents.	.30	210.00
Wolf, D.	11/11/21	Confer with M. Brown, S. Toomey, and M. Neely re status of trusts' insurance procurement.	.40	280.00
Martinez, S.	11/11/21	Review status of non-debtor release prohibition act of 2021.	.10	31.50
Gaske, A.	11/11/21	Confer with S. Sraders re creation of TDP flow charts.	.60	345.00
Sraders, S.	11/11/21	Confer with A. Gaske and E. Kaminsky re flowchart for TDPs.	.60	345.00
Sraders, S.	11/11/21	Review status of non-debtor prohibition release act of 2021.	.20	115.00
Kaminsky, E.	11/11/21	Confer with A. Gaske and S. Sraders re flowchart for TDPs.	.60	300.00
Hudson, J.	11/12/21	Confer with co-counsel for AHC (Kramer Levin) re insurance aspect of appeal.	.20	145.00
Hudson, J.	11/12/21	Confer with Debtors (Davis Polk) re contacting insurers re filing of policies as attachment to appeals.	.20	145.00
Hudson, J.	11/12/21	Revise insert for AHC appellate brief re insurance.	.10	72.50
Hudson, J.	11/12/21	Confer with insurer counsel re filing of policies as attachment to appeals.	.80	580.00
Wolf, D.	11/12/21	Confer with B. Kelly re trust agreements, trust distribution procedures, and supporting documents.	.50	350.00
Rush, M.	11/12/21	Confer with G. Cicero re claims database.	1.10	742.50
Leveridge, R.	11/12/21	Review communications among Davis Polk, J. Hudson, and insurers re use of insurance policies as exhibits in appellate proceedings.	.60	840.00
Hudson, J.	11/13/21	Draft insert for AHC appellate brief addressing insurance.	.80	580.00
Hudson, J.	11/13/21	Review Debtors' draft appellate brief re insurance issues.	.10	72.50
Gilbert, S.	11/14/21	Confer with AHC working group re trusts.	1.00	1,700.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	11/14/21	Revise NOAT briefing.	.70	1,190.00
Shore, R.	11/14/21	Review various proposals to respond to insurer plan objections (0.3); review Iron Shore objection and proposal (0.2); review dissenting States' objections and Debtors' response re insurance and comment on same (0.5).	1.00	1,350.00
Hudson, J.	11/14/21	Confer with Debtors and co-counsel re appellate status.	.20	145.00
Shore, R.	11/15/21	Review CGL policy and highlight key provisions for trustee background.	1.70	2,295.00
Hudson, J.	11/15/21	Revise insurance-related language for appellate briefs.	1.00	725.00
Wolf, D.	11/15/21	Revise confirmation appeal briefs insurance coverage matters.	2.10	1,470.00
Gilbert, S.	11/16/21	Confer with working group re plan-related strategy.	1.50	2,550.00
Wolf, D.	11/16/21	Revise trust agreements, trust distribution procedures, and supporting documents.	.50	350.00
Gilbert, S.	11/17/21	Confer with K. Eckstein re strategy.	.50	850.00
Gilbert, S.	11/17/21	Confer with NOAT working group re trust.	1.50	2,550.00
Gilbert, S.	11/17/21	Confer with MDT trustees and co-counsel re MDT insurance issues.	.80	1,360.00
Neely, M.	11/17/21	Confer with AON (M. Brown) and B. Kelly, S. Toomey, M. Atkinson, S. Gilbert, D. Wolf, and others MDT insurance presentation.	.80	500.00
Wolf, D.	11/17/21	Confer with client, co-counsel and C. Trabucchi re NOAT TDP and related trust documents.	1.40	980.00
Wolf, D.	11/17/21	Confer with MDT trustees and co-counsel re purchase of insurance coverage.	.80	560.00
Wolf, D.	11/17/21	Continue revising trust agreements, trust distribution procedures, and supporting documents.	.50	350.00
Wolf, D.	11/17/21	Confer with clients and co-counsel re status of bankruptcy proceedings and trust incorporation and strategy.	.40	280.00
Gilbert, S.	11/18/21	Attend omnibus hearing.	1.00	1,700.00
Gilbert, S.	11/18/21	Confer with Debtors re emergence economics.	1.00	1,700.00
Wolf, D.	11/18/21	Review and revise trust agreements, trust distribution procedures, and supporting documents.	.90	630.00
Johnson, K.	11/18/21	Review and revise citations in proposed order and twelfth amended plan re NOAT specific language.	1.20	276.00
Gaske, A.	11/18/21	Review bankruptcy plan for insurance-related language.	.30	172.50
Lopez, D.	11/18/21	Review proposed order re NOAT specific language.	.80	184.00

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Name	Date	Services	Hours	Amount
Gaske, A.	11/19/21	Review personal injury claimants TDP to create checklist and flow chart.	1.60	920.00
Hudson, J.	11/22/21	Outline potential interaction of TDP process on insurance recovery.	.10	72.50
Hudson, J.	11/22/21	Analyze claim presentation in governmental submissions.	.20	145.00
Martinez, S.	11/22/21	Confer with A. Gaske and L. Fastenau re trust distribution procedures requirement chart.	.30	94.50
Martinez, S.	11/22/21	Confer with L. Fastenau re TDP requirement chart.	.80	252.00
Gaske, A.	11/22/21	Confer with L. Fastenau and S. Martinez re creation of TDP flow charts.	.30	172.50
Gaske, A.	11/22/21	Draft portion of checklist for personal injury TDP.	1.10	632.50
Fastenau, L.	11/22/21	Review policies for products-completed operations hazard language.	3.60	1,134.00
Fastenau, L.	11/22/21	Confer with A. Gaske and S. Martinez re TDP requirements chart and products-completed operations hazard policy language.	.30	94.50
Fastenau, L.	11/22/21	Confer with S. Martinez re TDP requirements chart.	.80	252.00
Gilbert, S.	11/23/21	Confer with working group re plan-related strategy.	1.00	1,700.00
Martinez, S.	11/23/21	Confer with E. Kaminsky and L. Fastenau re policy language project.	.20	63.00
Martinez, S.	11/23/21	Confer with L. Fastenau re policy language project and TDP chart project.	.80	252.00
Fastenau, L.	11/23/21	Review policy language and TDP chart project.	.80	252.00
Wolf, D.	11/24/21	Correspond with counsel for Side A and Side B Sackler families re transfers of shareholder insurance rights.	1.50	1,050.00
Wolf, D.	11/24/21	Review and revise correspondence to insurers re D&O coverage.	2.00	1,400.00
Gaske, A.	11/24/21	Continue drafting checklist re what a personal injury claimant must show for payout from the trust.	1.30	747.50
Quinn, K.	11/27/21	Review District Court oral argument questions.	.50	550.00
Hudson, J.	11/27/21	Review Debtors' proposal for Liberty renewal.	.20	145.00
Wolf, D.	11/27/21	Review Judge McMahon oral argument questions re insurance (0.4); begin drafting responses re same (1.2).	1.60	1,120.00
Frazier, H.	11/27/21	Review relevant Debtors' appellate issues and briefing.	2.20	1,485.00
Quinn, K.	11/28/21	Confer with team re potential response to District Court questions.	1.00	1,100.00
Quinn, K.	11/28/21	Correspond with team re Debtors' appeal questions.	.40	440.00

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Name	Date	Services	Hours	Amount
Shore, R.	11/28/21	Review Judge McMahon questions (0.7); confer with team re same (1.0); review and revise settlement demand letter template (0.8); confer with Debtors' counsel, UCC counsel, and co-counsel re Judge McMahon questions (1.4); review and respond to correspondence re same (1.6).	5.50	7,425.00
Hudson, J.	11/28/21	Confer with team re response to Judge McMahon question re appeal (1.0); analyze approach to insurance-related issues at appellate argument (3.6).	4.60	3,335.00
Hudson, J.	11/28/21	Confer with Debtors re proposal for Liberty renewal.	.10	72.50
Grim, E.	11/28/21	Confer with team re response to insurance-related issues raised in Judge McMahon minute order.	1.00	700.00
Grim, E.	11/28/21	Analyze insurance-related issues raised in Judge McMahon minute order.	.20	140.00
Wolf, D.	11/28/21	Confer with R. Shore, K. Quinn, J. Hudson, E. Grim, and H. Frazier re responses to Judge McMahon questions re appellate oral argument.	1.00	700.00
Wolf, D.	11/28/21	Begin drafting oral argument outline re insurance issues for District Court appeal.	7.10	4,970.00
Wolf, D.	11/28/21	Confer with counsel for Debtors and other AHC counsel re responses to Judge McMahon questions re appellate oral argument.	.80	560.00
Frazier, H.	11/28/21	Confer with team re strategic insurance issues related to appeal.	1.00	675.00
Frazier, H.	11/28/21	Research Judge McMahon questions re insurance and jurisdictional issues.	1.20	810.00
Martinez, S.	11/28/21	Confer with P. McGlinchey re appeal materials for review in preparation for November 30 hearing.	.20	63.00
Martinez, S.	11/28/21	Review and organize materials in preparation of November 30, 2021 hearing.	2.50	787.50
Bonesteel, A.	11/28/21	Review previously produced documents in preparation for appeal.	.80	300.00
Gaske, A.	11/28/21	Research re insurance-related questions from appellate judge in preparation for oral argument.	3.90	2,242.50
Sraders, S.	11/28/21	Research California law re insurability of intentional acts in preparation of upcoming oral argument.	4.00	2,300.00
McGlinchey, P.	11/28/21	Confer with S. Martinez re preparation for upcoming hearing.	.20	46.00
McGlinchey, P.	11/28/21	Research exhibits included in appendices in preparation for upcoming hearing.	1.00	230.00
Kaminsky, E.	11/28/21	Research insurance issues noticed by District Court Judge for oral argument re insurance and state statutes limiting remedies.	1.80	900.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	11/28/21	Research insurance issues for appeal.	.60	300.00
Gilbert, S.	11/29/21	Confer with working group re plan.	1.00	1,700.00
Gilbert, S.	11/29/21	Confer with team re appeal strategy.	.50	850.00
Quinn, K.	11/29/21	Correspond with team re research and status of argument prep.	.20	220.00
Shore, R.	11/29/21	Confer with team re planning for appeal hearing (0.5); confer with AHC re District Court hearing planning and strategy (1.0); review insurance issues re same (0.8).	2.30	3,105.00
Hudson, J.	11/29/21	Revise outline for appellate argument on insurance-related issues.	1.30	942.50
Hudson, J.	11/29/21	Confer with AHC and co-counsel re oral argument on appeal.	1.00	725.00
Hudson, J.	11/29/21	Confer with S. Gilbert and others re appellate issues.	.50	362.50
Wolf, D.	11/29/21	Continue drafting oral argument outline re insurance issues for District Court appeal hearing.	8.80	6,160.00
Wolf, D.	11/29/21	Confer with client and co-counsel re appellate oral argument.	1.00	700.00
Wolf, D.	11/29/21	Confer with S. Gilbert, R. Shore, H. Frazier and J. Hudson re appellate oral argument preparation.	.50	350.00
Frazier, H.	11/29/21	Analyze Judge McMahon questions re insurance related issues.	1.70	1,147.50
Frazier, H.	11/29/21	Confer with team re appellate issues.	.50	337.50
Frazier, H.	11/29/21	Confer with Debtors' counsel re appellate issues.	1.00	675.00
Martinez, S.	11/29/21	Finalize review of J. DelConte stipulation in anticipation of November 30, 2021 hearing.	1.10	346.50
Johnson, K.	11/29/21	Initial review of certain policies in preparation for 11.30.2021 appeal hearing.	4.10	943.00
Gaske, A.	11/29/21	Draft flowchart showing personal injury TDP claim submission process.	1.20	690.00
Gaske, A.	11/29/21	Review certain policy for language on defense costs treatment re preparation for appellate hearing.	1.10	632.50
Leveridge, R.	11/29/21	Confer with team re case status and impact on adversary.	.50	700.00
Leveridge, R.	11/29/21	Review legal research re coverage issues on appeal.	2.20	3,080.00
Fastenau, L.	11/29/21	Review and organize pertinent documents for upcoming appeal hearing.	2.10	661.50
Fastenau, L.	11/29/21	Revise TDP chart.	.60	189.00
Fastenau, L.	11/29/21	Prepare pertinent documents for upcoming hearing.	.60	189.00
Sraders, S.	11/29/21	Research re fraudulent transfer claims.	2.80	1,610.00

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Name	Date	Services	Hours	Amount
Sraders, S.	11/29/21	Analyze claims asserted against Sacklers in California.	2.30	1,322.50
Colcock, S.	11/29/21	Organize U.S. Trustee appeal materials for 11.30.2021 hearing.	.60	198.00
Colcock, S.	11/29/21	Initial review of certain policies in preparation for 11.30.2021 appeal hearing.	4.50	1,485.00
McGlinchey, P.	11/29/21	Research exhibits included in appendices in preparation for upcoming hearing.	.80	184.00
Kaminsky, E.	11/29/21	Continue researching insurance issues re insurance and state statutes limiting remedies.	5.90	2,950.00
Lloyd, M.	11/29/21	Review certain policies in preparation for 11.30.2021 appeal hearing.	3.50	682.50
Turner, C.	11/29/21	Initial policy review in preparation for 11.30.2021 appeal hearing.	3.40	663.00
Gilbert, S.	11/30/21	Attend oral arguments (via conference call) in District Court.	7.50	12,750.00
Quinn, K.	11/30/21	Confer with team re appeal argument.	.50	550.00
Quinn, K.	11/30/21	Monitor hearing.	1.50	1,650.00
Quinn, K.	11/30/21	Correspond with D. Wolf and R. Shore re hearing.	.30	330.00
Hudson, J.	11/30/21	Review appellate research.	.10	72.50
Wolf, D.	11/30/21	Finalize drafting outline re insurance issues for oral argument in District Court.	1.80	1,260.00
Wolf, D.	11/30/21	Attend appellate oral argument.	7.50	5,250.00
Frazier, H.	11/30/21	Attend appellate hearing via conference call.	7.50	5,062.50
Gaske, A.	11/30/21	Research re scienter for fraud claims in preparation for appellate argument.	2.00	1,150.00
Sraders, S.	11/30/21	Research re fraudulent conveyance.	2.50	1,437.50
<b>Project Total:</b>			<b>252.60</b>	<b>\$ 217,813.50</b>

#### A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	11/01/21	Review and provide comments on letter to Gulf re discovery issues and deficiency letter template to insurers (1.5); confer with R. Leveridge and J. Rubinstein re same (0.5).	2.00	2,700.00
Hudson, J.	11/01/21	Analyze potential approaches to expert-related issues for coverage case.	1.20	870.00
Hudson, J.	11/01/21	Confer with Debtors (Davis Polk) re document review process.	.30	217.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	11/01/21	Correspond with Debtors' counsel re insurance document review (0.3); confer with Debtors' counsel and UCC counsel re same (1.2); review materials and issues in preparation for meet-and-confer with insurer counsel re policy stipulations (1.5); meet-and-confer with XLIA re same (0.3); confer with Navigators re same (0.3); confer with litigation team re expert issues (1.2); review R. Shore edits to deficiency letter (0.3); review R. Shore edits to response to October 21 Gulf and St. Paul letter (0.2); confer with R. Shore and R. Leveridge re strategy (0.5); revise response letter to Gulf and St. Paul (0.4); revise responses to defendants' requests for production to Committees (0.6).	6.80	5,440.00
Rush, M.	11/01/21	Confer with team re experts.	1.20	810.00
Rush, M.	11/01/21	Revise draft deficiency letter.	.50	337.50
Johnson, K.	11/01/21	Review and organize Debtors' and insurer policies re page discrepancies from previous policy comparison in preparation for policy stipulations.	5.50	1,265.00
Gaske, A.	11/01/21	Confer with Cobra, Committee representatives, Debtors' insurance counsel, and J. Rubinstein re document review training.	1.20	690.00
Gaske, A.	11/01/21	Confer with C. Sorensen, A. Deleo, and J. Rubinstein re Navigators policy stipulation process.	.30	172.50
Gaske, A.	11/01/21	Review Navigators policies in litigation to answer question from call with Navigators' counsel.	.20	115.00
Gaske, A.	11/01/21	Communicate with paralegal team re creating policy comparison materials.	.70	402.50
Gaske, A.	11/01/21	Confer with XL Insurance counsel, A. Deleo, and J. Rubinstein re potential policy stipulation.	.30	172.50
Gaske, A.	11/01/21	Revise discovery responses to incorporate J. Hudson comments.	.90	517.50
Leveridge, R.	11/01/21	Analyze defensive discovery (0.4); review R. Shore edits to letter to opposing counsel (0.2); confer with R. Shore and J. Rubinstein re same (0.5).	1.10	1,540.00
Leveridge, R.	11/01/21	Confer with team re offensive case and experts (1.2); review materials re same (1.1).	2.30	3,220.00
Fastenau, L.	11/01/21	Review and organize Insurer #6 policies with discrepancies for attorney review.	2.90	913.50
Carey, C.	11/01/21	Analyze case status and strategy re Issue #32 review.	.40	170.00
Sraders, S.	11/01/21	Draft summary of documents re Issue #58 in preparation for upcoming call.	.40	230.00

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Name	Date	Services	Hours	Amount
Sraders, S.	11/01/21	Review policies and related correspondence from Insurer #36.	1.90	1,092.50
Sraders, S.	11/01/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, and M. Rush re experts.	1.20	690.00
Hubbard, B.	11/01/21	Review report by J. Horewitz re minimum opioid liability analysis (1.0); review sample underlying Delaware complaint (0.5).	1.50	637.50
Shore, R.	11/02/21	Review decisions re Issue #20 in prior Debtors' coverage litigation (0.5); confer with J. Rubinstein re same (0.2).	.70	945.00
Rubinstein, J.	11/02/21	Correspond with AGLIC and Steadfast counsel re policy stipulation (0.2); communications with R. Leveridge re strategy (0.7); confer with R. Shore re strategy (0.2); revise Committee responses to discovery requests (0.7); revise deficiency letters (0.7); provide comments on draft document vendor agreement (0.8).	3.30	2,640.00
Rush, M.	11/02/21	Draft deficiency letters.	5.20	3,510.00
Johnson, K.	11/02/21	Continue reviewing and organizing Debtors' and insurer policies re Insurers #15, #23, #24, and #27 re page discrepancies from previous policy comparison in preparation for policy stipulations.	6.30	1,449.00
Gaske, A.	11/02/21	Communicate with K. Johnson re policy comparisons project.	.20	115.00
Gaske, A.	11/02/21	Revise discovery responses addressed to AHC and UCC to incorporate comments from R. Leveridge and J. Rubinstein.	1.40	805.00
Leveridge, R.	11/02/21	Communications with Debtors' counsel re coverage issues from earlier Debtors' coverage matter (0.3); review material provided by Debtors' counsel re same (0.9).	1.20	1,680.00
Leveridge, R.	11/02/21	Review edits to Ad Hoc Committee responses to request for production.	.60	840.00
Leveridge, R.	11/02/21	Review draft deficiency letters to insurers.	.40	560.00
Leveridge, R.	11/02/21	Communications with team re retaining document vendor to host productions.	.60	840.00
Fastenau, L.	11/02/21	Review and organize Insurer #6 policies with discrepancies for attorney review.	2.20	693.00
Carey, C.	11/02/21	Revise memoranda re Issue #32 review.	1.50	637.50
Carey, C.	11/02/21	Analyze materials re Issue #32 review.	1.80	765.00
Sraders, S.	11/02/21	Analyze CGL and Bermuda policies for representative example of each.	.40	230.00
Sraders, S.	11/02/21	Review briefing re Issues #32 and #57.	1.30	747.50

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Name	Date	Services	Hours	Amount
Kaminsky, E.	11/02/21	Revise memorandum re Issue #1.	2.80	1,400.00
Kaminsky, E.	11/02/21	Revise memorandum re Issue #2.	.90	450.00
Hudson, J.	11/03/21	Revise meet-and-confer letter to insurers.	.30	217.50
Rubinstein, J.	11/03/21	Communicate with R. Shore re historic discovery responses (0.3) analysis re same (1.3); correspond with Debtors' counsel re response letter to B. Friedman (0.1); revise deficiency letters to Liberty, Aspen, NAE, and National Union (1.5); revise letter to insurers re meet-and-confer discussions (0.4); analysis re historic expert reports (1.1); analysis re requirements to prove affirmative case (0.5); analysis re Issue #20 (0.5); correspond with AGLIC and Steadfast counsel re policy stipulation meet-and-confer (0.2).	5.90	4,720.00
Rush, M.	11/03/21	Draft deficiency letters to insurers.	6.20	4,185.00
Rush, M.	11/03/21	Review letter to insurers re plaintiffs' productions.	.40	270.00
Johnson, K.	11/03/21	Review and organize research re Steadfast litigation.	.20	46.00
Johnson, K.	11/03/21	Review and organize Debtors' and insurer policies re Insurers #18, #19, #20, and #33 and page discrepancies from previous policy comparison in preparation for policy stipulations.	4.70	1,081.00
Gaske, A.	11/03/21	Review coverage decisions in prior Steadfast litigation.	.40	230.00
Gaske, A.	11/03/21	Review R. Leveridge comments to memorandum on Issue #20.	.20	115.00
Leveridge, R.	11/03/21	Review rulings from previous coverage case (1.2); review memorandum re legal issues in current case (2.4).	3.60	5,040.00
Leveridge, R.	11/03/21	Communications with team re offensive discovery.	.70	980.00
Leveridge, R.	11/03/21	Communications with counsel for Debtors and UCC re letter to insurers responding to asserted defensive discovery deficiencies.	.40	560.00
Leveridge, R.	11/03/21	Review and revise draft letter from Debtors' counsel re follow up on Court proposals from discovery conference.	1.20	1,680.00
Leveridge, R.	11/03/21	Communications with team re experts.	.60	840.00
Ogrey, S.	11/03/21	Confer with S .Sraders re expert report background research.	.30	69.00
Ogrey, S.	11/03/21	Draft expert report background research review tracking sheet.	.70	161.00
Fastenau, L.	11/03/21	Review and organize Insurers #6 and #20 policies with discrepancies for attorney review.	5.20	1,638.00

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Name	Date	Services	Hours	Amount
Carey, C.	11/03/21	Research re Issue #32.	2.30	977.50
Carey, C.	11/03/21	Analyze materials re Issue #32 review.	1.80	765.00
Sraders, S.	11/03/21	Review comments to draft discovery deficiency letters.	.40	230.00
Sraders, S.	11/03/21	Communicate with K. Johnson re policy organization.	.10	57.50
Sraders, S.	11/03/21	Review existing materials re Issue #58 (0.4), confer with S. Ogrey re preparing chart re Issue #58 (0.3).	.70	402.50
Sraders, S.	11/03/21	Analyze policies from Insurer #36 in connection with Issue #44.	2.30	1,322.50
Sraders, S.	11/03/21	Review memorandum re Issue #20.	.20	115.00
Kaminsky, E.	11/03/21	Research re Issue #55.	1.60	800.00
Kaminsky, E.	11/03/21	Research re Issue #53.	2.20	1,100.00
Hubbard, B.	11/03/21	Draft notes and questions re proofs of claim data.	3.10	1,317.50
Shore, R.	11/04/21	Confer with team re litigation status and pending discovery issues.	1.00	1,350.00
Shore, R.	11/04/21	Review edits to letter to B. Freedman (0.2); review and revise Committee request for production responses (0.4); review prior brief re Issue #56 and related emails (0.9).	1.50	2,025.00
Hudson, J.	11/04/21	Confer with team re litigation status and strategy (partial).	.90	652.50
Hudson, J.	11/04/21	Analyze proofs of claim.	.10	72.50
Girgenti, J.	11/04/21	Communicate with A. Gaske and C. Carey re Steadfast insurance documents (0.1); confer with team re case update (1.0).	1.10	401.50
Girgenti, J.	11/04/21	Review insurer databases for extant Steadfast insurance policies.	.20	73.00

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Rubinstein, J.	11/04/21	Review status of pending litigation projects (0.3); review issues to be discussed in preparation for meet-and-confer call with AGLIC and Steadfast counsel re policy stipulation (0.3); correspond with NAE and Aspen counsel re policy stipulation (2.0); review discovery correspondence from National Union (0.2); analyze Navigators second set of interrogatories and determine initial responses (0.3); confer with team re litigation strategy (1.0); analyze Rhodes defense costs production (0.5); revise response letter to B. Friedman (0.3); analysis re Issue #56 (0.8); revise deficiency letter to Navigators (0.2); analyze underlying claim data (0.4); analyze pleadings from Steadfast litigation (0.4); revise deficiency letter to XL (0.3); communicate with team re edits to AHC discovery responses (0.2).	7.20	5,760.00
Rush, M.	11/04/21	Confer with team re case status and strategy	1.00	675.00
Rush, M.	11/04/21	Draft deficiency letters to insurers.	3.50	2,362.50
Martinez, S.	11/04/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Grgenti, E. Kaminsky, R. Leveridge, R. Shore, B. Hubbard, I. Agwu, L. Fastenau, S. Colcock, S. Sraders, K. Johnson, and A. Bonesteel re case strategy and updates.	1.00	315.00
Johnson, K.	11/04/21	Review adversary proceeding coverage charts.	.10	23.00
Johnson, K.	11/04/21	Confer with S. Sraders re Insurer #36 produced policies.	.10	23.00
Johnson, K.	11/04/21	Review and organize correspondence from Insurer #24.	.10	23.00
Johnson, K.	11/04/21	Review and organize discovery responses and requests to send to co-counsel (Akin Gump).	.40	92.00
Johnson, K.	11/04/21	Confer with R. Leveridge, J. Hudson, J. Rubinstein, R. Shore, M. Rush, J. Grgenti, C. Carey, A. Gaske, S. Sraders, B. Hubbard, S. Colcock, L. Fastenau, A. Bonesteel, and S. Martinez re status and strategy.	1.00	230.00
Johnson, K.	11/04/21	Continue organizing Debtors' and insurer policies re Insurers #18, #19, #20, and #36 and page discrepancies from previous policy comparison in preparation for policy stipulations.	3.00	690.00
Bonesteel, A.	11/04/21	Confer with R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, S. Sraders, C./ Carey, M. Rush, A. Gaske, E. Kaminsky, S. Colcock and K. Johnson re status and strategy.	1.00	375.00
Gaske, A.	11/04/21	Confer with team re strategy and case updates.	1.00	575.00

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Name	Date	Services	Hours	Amount
Gaske, A.	11/04/21	Revise tracking of insurer instructions and objections to instructions re eliminating duplication.	1.60	920.00
Gaske, A.	11/04/21	Review comparison of Steadfast and AGLIC policies in preparation for potential policy stipulation.	1.80	1,035.00
Leveridge, R.	11/04/21	Confer with team re insurance adversary proceeding.	1.00	1,400.00
Leveridge, R.	11/04/21	Review draft deficiency letters to insurers.	.90	1,260.00
Leveridge, R.	11/04/21	Review draft defensive discovery responses (0.9); communications with Debtors' counsel re defensive discovery status (0.3).	1.20	1,680.00
Leveridge, R.	11/04/21	Review burden of proof and methods for proving coverage.	.70	980.00
Ogrey, S.	11/04/21	Finish drafting expert report background document review tracking sheet.	.20	46.00
Fastenau, L.	11/04/21	Confer with team re case status and discovery-related issues.	1.00	315.00
Carey, C.	11/04/21	Analyze Issue #32 materials.	4.70	1,997.50
Carey, C.	11/04/21	Confer with team re case update.	1.00	425.00
Carey, C.	11/04/21	Revise memoranda re Issue #32 review.	1.60	680.00
Sraders, S.	11/04/21	Confer with K. Johnson re Insurer #36 policies.	.10	57.50
Sraders, S.	11/04/21	Confer with team re recent developments and strategy for next steps in case.	1.00	575.00
Sraders, S.	11/04/21	Review draft insurer deficiency letters.	.20	115.00
Sraders, S.	11/04/21	Review insurer correspondence re Bermuda form policies.	2.60	1,495.00
Sraders, S.	11/04/21	Research re Issue #56.	1.60	920.00
Colcock, S.	11/04/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, B. Hubbard, I. Agwu, L. Fastenau, S. Martinez, S. Sraders, K. Johnson, A. Bonesteel re case strategy and updates.	1.00	330.00
Kaminsky, E.	11/04/21	Confer with team re litigation strategy.	1.00	500.00
Hubbard, B.	11/04/21	Confer with R. Leveridge, J. Hudson, M. Rush, A. Gaske, E. Kaminsky, S. Colcock and K. Johnson re status and strategy.	1.00	425.00
Hubbard, B.	11/04/21	Review consolidated claim form and related proofs of claim data.	.70	297.50
Agwu, I.	11/04/21	Confer with team re case updates and strategy.	1.00	200.00

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Name	Date	Services	Hours	Amount
Shore, R.	11/05/21	Communicate with team re privilege objections re request for production responses (0.3); communicate with R. Leveridge re potential consulting expert (0.2); review governmental claim description (0.3); communicate with R. Leveridge re same and Issue #56 analysis (0.4).	1.20	1,620.00
Hudson, J.	11/05/21	Confer with AHC co-counsel re response to insurer requests for production to committees.	.10	72.50
Rubinstein, J.	11/05/21	Analysis re Issue #56 (1.0); revise AHC discovery responses (0.6); revise deficiency letters (0.6); communication with UCC counsel re same (0.2); correspond with NAE/Aspen counsel re policy stipulation meet-and-confer (0.1); analyze prior litigation pleadings (1.2); analysis re Issue #20 (0.6); analysis re underlying complaints (1.9).	6.20	4,960.00
Rush, M.	11/05/21	Revise deficiency letters to insurers.	3.00	2,025.00
Rush, M.	11/05/21	Analyze research re Issue #56.	.30	202.50
Johnson, K.	11/05/21	Review insurance litigation plan tracking spreadsheet.	.10	23.00
Johnson, K.	11/05/21	Review and organize correspondence between Reed Smith and Insurer #15.	.20	46.00
Johnson, K.	11/05/21	Continue reviewing and organizing Debtors' and insurer policies re Insurers #18, #19, and #20 page discrepancies from previous policy comparison in preparation for policy stipulations.	5.70	1,311.00
Gaske, A.	11/05/21	Revise discovery responses from AHC and UCC to incorporate comments from R. Shore.	1.60	920.00
Gaske, A.	11/05/21	Research re Issue #27.	1.20	690.00
Gaske, A.	11/05/21	Review and revise spreadsheet tracking discovery requests and responses.	2.80	1,610.00
Leveridge, R.	11/05/21	Communications with team re defensive and offensive discovery.	1.70	2,380.00
Leveridge, R.	11/05/21	Review research re Issue #56 and consolidated governmental claim.	1.40	1,960.00
Carey, C.	11/05/21	Communicate with M. Rush re Issue #32 research and next steps.	.20	85.00
Carey, C.	11/05/21	Revise Issue #32 research memorandum.	.50	212.50
Carey, C.	11/05/21	Analyze materials re Issue #32 review.	2.70	1,147.50
Sraders, S.	11/05/21	Review complaint filed by Massachusetts AG.	.30	172.50
Sraders, S.	11/05/21	Confer with J. Rubinstein re Bermuda form policies.	.40	230.00
Sraders, S.	11/05/21	Research re Issue #56.	3.00	1,725.00
Sraders, S.	11/05/21	Revise chart re Issue #58.	.20	115.00
Kaminsky, E.	11/05/21	Analyze strategy re defensive discovery.	.70	350.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	11/05/21	Draft memorandum re Issue #2.	2.80	1,400.00
Hubbard, B.	11/05/21	Review correspondence re Issue #56 and related methodology.	1.50	637.50
Hudson, J.	11/07/21	Communicate with litigation team re finalizing document review process.	.10	72.50
Rubinstein, J.	11/07/21	Review UCC comments to discovery responses to requests for production served on the Committees (0.2); revise deficiency letters to insurer defendants (0.4); analysis re underlying complaints (1.5).	2.10	1,680.00
Gaske, A.	11/07/21	Revise discovery responses per UCC comments.	.40	230.00
Leveridge, R.	11/07/21	Review UCC edits to committee responses to insurer request for production.	.30	420.00
Kaminsky, E.	11/07/21	Draft memorandum re Issue #1.	2.20	1,100.00
Shore, R.	11/08/21	Review District Court ruling re motion to withdraw the reference.	.70	945.00
Shore, R.	11/08/21	Confer with team re proofs of claim (1.4); confer with team re case strategy (0.2).	1.60	2,160.00
Hudson, J.	11/08/21	Revise proposed vendor agreement for hosting of Ad Hoc Committee materials.	1.20	870.00
Hudson, J.	11/08/21	Review proofs of claim summary in advance of strategy discussion.	.10	72.50
Hudson, J.	11/08/21	Confer with B. Hubbard re proofs of claim data.	.90	652.50
Hudson, J.	11/08/21	Confer with team re proofs of claim data.	1.40	1,015.00
Hudson, J.	11/08/21	Confer with co-counsel (Brown Rudnick) re proof of claim analysis.	.50	362.50
Girgenti, J.	11/08/21	Communicates with R. Leveridge, J. Rubinstein, and C. Carey re insurance production summary reports.	.10	36.50
Rubinstein, J.	11/08/21	Correspond with M. Rush re deficiency letters to insurers (0.2); review issues in preparation for call with Steadfast/AGLIC counsel re policy stipulation (0.2); confer with Steadfast/AGLIC counsel re same (0.3); confer with team re claim analysis (1.5); analysis re experts (0.8)	3.00	2,400.00
Rush, M.	11/08/21	Revise deficiency letters.	6.60	4,455.00
Rush, M.	11/08/21	Review e-discovery vendor contract.	.50	337.50
Rush, M.	11/08/21	Review Court order re motion to withdraw reference.	.30	202.50
Johnson, K.	11/08/21	Review and organize correspondence to all defendant insurers.	.20	46.00

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Name	Date	Services	Hours	Amount
Johnson, K.	11/08/21	Finalize review and organization of Debtors' and insurer policies re Insurers #18, #19, and #20 in preparation for policy stipulations (1.5); final review and organization of all Debtors' and insurer policies (2.0).	3.50	805.00
Bonesteel, A.	11/08/21	Communicate with vendors re upcoming email review.	.30	112.50
Gaske, A.	11/08/21	Confer with Steadfast and American Guarantee re process for policy stipulation.	.30	172.50
Gaske, A.	11/08/21	Revise and finalize discovery responses to National Union request for production (2.5); serve discovery responses via email (0.4).	2.90	1,667.50
Leveridge, R.	11/08/21	Communicate with team re analysis of claims and status of litigation projects (1.6); review communications with co-counsel re offensive and defensive discovery (0.6).	2.20	3,080.00
Carey, C.	11/08/21	Draft summary memorandum re Issue #32 review.	3.90	1,657.50
Carey, C.	11/08/21	Analyze materials re Issue #32 review.	4.50	1,912.50
Sraders, S.	11/08/21	Review District Court opinion denying motion to withdraw the reference.	.20	115.00
Sraders, S.	11/08/21	Continue research re Issue #56.	3.20	1,840.00
Sraders, S.	11/08/21	Review reports re Issue #58.	1.10	632.50
Kaminsky, E.	11/08/21	Draft memorandum re Issue #2.	1.90	950.00
Hubbard, B.	11/08/21	Draft notes re proofs of claim data for conversation with larger group (0.7); revise notes in follow up to call re same (1.2).	1.90	807.50
Hubbard, B.	11/08/21	Confer with J. Hudson re proofs of claim data (0.9); confer with R. Shore, J. Hudson, R. Leveridge, J. Rubinstein, and M. Rush re same data (1.4).	2.30	977.50
Shore, R.	11/09/21	Review District Court decision re motion to withdraw the reference (0.4); revise draft communication to client re same (0.6); communicate with S. Gilbert re same (0.5); communicate with other claimant group counsel (0.8); review insurance briefing (1.0); review correspondence re same (0.4).	3.70	4,995.00
Hudson, J.	11/09/21	Revise proposed vendor agreement for hosting of Ad Hoc Committee materials.	1.60	1,160.00
Hudson, J.	11/09/21	Revise discovery responses.	.10	72.50

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Name	Date	Services	Hours	Amount
Girgenti, J.	11/09/21	Draft insurance summary re review of Navigators insurance production (1.7); draft insurance summary re review of National Union's insurance production (0.9); draft insurance summary re review of XL insurance production (0.6); draft insurance summary re review of Liberty insurance production (1.4).	4.60	1,679.00
Frazier, H.	11/09/21	Review District Court ruling and analysis re adversary proceeding.	.40	270.00
Rush, M.	11/09/21	Draft summary of District Court ruling on motion to withdraw reference for client.	.50	337.50
Martinez, S.	11/09/21	Review and organize insurer production materials.	.20	63.00
Johnson, K.	11/09/21	Review and organize deficiency letters.	.20	46.00
Johnson, K.	11/09/21	Review Aspen, Gulf/St. Paul, and NAE key documents for document review memoranda.	.60	138.00
Leveridge, R.	11/09/21	Review opinion from District Court denying motion to withdraw the reference (0.6); review communication to AHC and other parties with common interest (1.6).	2.20	3,080.00
Ogrey, S.	11/09/21	Review Aspen, Gulf/St. Paul, and NAE key documents for document review memoranda.	.60	138.00
Fastenau, L.	11/09/21	Revise spreadsheet tracking discovery-related correspondence with insurers.	2.10	661.50
Carey, C.	11/09/21	Continue analyzing materials re Issue #32.	5.40	2,295.00
Carey, C.	11/09/21	Revise summary memorandum re Issue #32 review.	3.30	1,402.50
Sraders, S.	11/09/21	Review Oklahoma Supreme Court decision re opioid manufacturer liability for public nuisance.	.20	115.00
Sraders, S.	11/09/21	Draft memorandum re Issue #56.	1.20	690.00
Sraders, S.	11/09/21	Draft chart summarizing expert reports.	.80	460.00
Sraders, S.	11/09/21	Continue researching Issues #56 and #57.	2.40	1,380.00
Shore, R.	11/10/21	Confer with J. Rubinstein and R. Leveridge re expert selection for claims analysis (0.6); review insurance background materials (0.9).	1.50	2,025.00
Shore, R.	11/10/21	Communicate with S. Higgins re adversary proceeding inquiries.	.30	405.00
Hudson, J.	11/10/21	Confer with AHC co-counsel (G. Cicero) re background on proofs of claim.	.10	72.50
Hudson, J.	11/10/21	Revise responses to Navigators' second set of interrogatories.	.90	652.50
Hudson, J.	11/10/21	Revise document vendor agreement for discovery purposes.	.20	145.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	11/10/21	Communicate with team re status of various research memoranda (0.4); review draft document vendor retention agreement (0.3); correspond with R. Leveridge and R. Shore re analysis of potential experts and investigation re same (0.8); review Oklahoma Supreme Court decision re public nuisance (0.8); revise responses to Navigators second set of interrogatories (0.8); review deficiency letter re meet-and-confer discussions (0.2).	3.30	2,640.00
Rush, M.	11/10/21	Communicate with team re status of research assignments.	.20	135.00
Rush, M.	11/10/21	Continue research re Issue #14.	.80	540.00
Johnson, K.	11/10/21	Review Debtors' insurer policy comparison materials.	2.00	460.00
Gaske, A.	11/10/21	Review draft answers to Navigators second set of interrogatories.	2.40	1,380.00
Gaske, A.	11/10/21	Revise answers to Navigators' second set of interrogatories pursuant to J. Hudson comments.	1.20	690.00
Leveridge, R.	11/10/21	Communications with team re legal research and discovery.	.70	980.00
Leveridge, R.	11/10/21	Confer with R. Shore and J. Rubinstein re strategy issues and potential motions for partial summary judgment (0.6); communications with counsel for preliminary injunctive claimants re schedule for adversary proceeding (0.5).	1.10	1,540.00
Leveridge, R.	11/10/21	Review discovery vendor agreement.	.60	840.00
Leveridge, R.	11/10/21	Review communications with co-counsel from B. Rudnick re proofs of claim in bankruptcy re coverage issues.	.60	840.00
Ogrey, S.	11/10/21	Review Debtors' policy comparison re Aspen and Munch Re policies.	.50	115.00
Ogrey, S.	11/10/21	Review discovery re document review memoranda for Aspen, NAE, Gulf, and Navigators.	1.20	276.00
Fastenau, L.	11/10/21	Review and organize most recent proofs of claim reports for attorney review.	.60	189.00
Carey, C.	11/10/21	Analyze Issue #32 materials.	5.10	2,167.50
Carey, C.	11/10/21	Revise Issue #32 summary memorandum.	3.40	1,445.00
Sraders, S.	11/10/21	Confer with B. Hubbard re Issue #56.	.80	460.00
Sraders, S.	11/10/21	Continue drafting memorandum re Issue #56.	2.50	1,437.50
Kaminsky, E.	11/10/21	Draft memorandum re Issues #1 and #2.	1.30	650.00

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Name	Date	Services	Hours	Amount
Turner, C.	11/10/21	Review and organize Aspen, Gulf/St. Paul, NAE, NAV, and LM key documents for document review memoranda.	1.70	331.50
Hubbard, B.	11/10/21	Confer with S. Sraders re Issue #56.	.80	340.00
Shore, R.	11/11/21	Confer with team re case status (0.8); confer with R. Leveridge and J. Rubinstein re strategu (0.5); finalize SR policy (0.2).	1.50	2,025.00
Hudson, J.	11/11/21	Confer with team re litigation status and strategy.	.80	580.00
Hudson, J.	11/11/21	Revise responses to Navigators' second set of interrogatories.	.20	145.00
Hudson, J.	11/11/21	Confer with co-counsel (A. Crawford) re operative policy language.	.50	362.50
Hudson, J.	11/11/21	Summarize status of litigation issue re National Union.	1.30	942.50
Girgenti, J.	11/11/21	Confer with team re case update and strategy (0.8); communications with S. Ogrey re policy language reports (0.2).	1.00	365.00
Rubinstein, J.	11/11/21	Confer with R. Shore and R. Leveridge re strategy (0.5); analysis re motions practice (0.9); revise multiple sets of discovery responses (1.3); confer with team re strategy (0.8); confer with R. Leveridge re strategy (0.6).	4.10	3,280.00
Rush, M.	11/11/21	Continue researching Issue #14.	.80	540.00
Rush, M.	11/11/21	Confer with team re case status and strategy.	.80	540.00
Martinez, S.	11/11/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, E. Kaminsky, R. Leveridge, R. Shore, B. Hubbard, S. Colcock, S. Sraders, K. Johnson, A. Bonesteel re case strategy and updates.	.80	252.00
Johnson, K.	11/11/21	Revise master objection document to discovery responses and master substantive discovery responses document re Insurers #18, #19, and #20.	1.10	253.00
Johnson, K.	11/11/21	Confer with R. Leveridge, J. Hudson, J. Rubinstein, R. Shore, M. Rush, J. Girgenti, C. Carey, A. Gaske, S. Sraders, B. Hubbard, S. Colcock, A. Bonesteel, and S. Martinez re status and strategy.	.80	184.00
Bonesteel, A.	11/11/21	Confer with team re status and strategy.	.80	300.00
Gaske, A.	11/11/21	Confer with team re litigation strategy.	.80	460.00
Gaske, A.	11/11/21	Review supplemental response to Navigators' first set of interrogatories.	.40	230.00
Gaske, A.	11/11/21	Draft portion of memorandum re Issue #27.	.80	460.00
Leveridge, R.	11/11/21	Confer with A. Crawford (UCC) re strategy in the adversary proceeding.	.70	980.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	11/11/21	Confer with team re adversary proceeding status.	.80	1,120.00
Leveridge, R.	11/11/21	Review reports from J. Grgenti and C. Carey re review of insurer document productions.	1.40	1,960.00
Ogry, S.	11/11/21	Review materials to be sent to Akin Gump re KCIC policy language reports and previous insurance coverage presentation.	1.40	322.00
Carey, C.	11/11/21	Revise memorandum summary re Issue #32 review.	3.60	1,530.00
Carey, C.	11/11/21	Confer with team re case status and strategy.	.80	340.00
Carey, C.	11/11/21	Analyze Issue #32 materials.	4.10	1,742.50
Sraders, S.	11/11/21	Confer with team re strategy and next steps.	.80	460.00
Sraders, S.	11/11/21	Draft memorandum re Issue #56.	1.50	862.50
Colcock, S.	11/11/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Grgenti, E. Kaminsky, R. Leveridge, R. Shore, B. Hubbard, I. Agwu, S. Martinez, S. Sraders, K. Johnson, A. Bonesteel re case strategy and updates.	.80	264.00
Kaminsky, E.	11/11/21	Draft memorandum re Issues #1 and #2.	1.20	600.00
Kaminsky, E.	11/11/21	Confer with team re status and strategy.	.80	400.00
Turner, C.	11/11/21	Review and organize NAE key documents for document review memoranda.	.30	58.50
Hubbard, B.	11/11/21	Confer with M. Rush, A. Gaske, S. Sraders, R. Leveridge, J. Rubinstein, R. Shore, J. Hudson, K. Johnson, E. Kaminsky, A. Bonesteel, and C. Carey re status and strategy.	.80	340.00
Shore, R.	11/12/21	Confer with J. Hudson re National Union strategy (0.1); review National Union appeal brief (1.4).	1.50	2,025.00
Hudson, J.	11/12/21	Confer with Directors of Analytics (B. Hubbard) re approach to proof of claim analysis.	.40	290.00
Hudson, J.	11/12/21	Confer with AHC co-counsel (G. Cicero), Directors of Analytics (B. Hubbard), and litigation team re approach to proof of claim analysis.	.50	362.50
Hudson, J.	11/12/21	Confer with R. Shore re status of litigation issue concerning National Union.	.10	72.50
Hudson, J.	11/12/21	Confer with Debtors' counsel (Reed Smith) re responding to National Union recent discovery correspondence.	.50	362.50
Grgenti, J.	11/12/21	Research re Debtors' insurance policy language reports.	.50	182.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	11/12/21	Begin review of insurer production review summaries (0.3); review comments re document vendor retention agreement (0.1); correspond with R. Shore and R. Leveridge re strategy (0.1); review insurer correspondence re alleged technical production deficiencies (0.4); review summary information re respective insurer productions (1.3); confer with AHC counsel re claim information (1.0); confer with Debtors' counsel, R. Leveridge, and J. Hudson re discovery matters (0.5); review correspondence with insurer counsel re meet-and-confer discussions re deficiency letters (0.2).	3.90	3,120.00
Rush, M.	11/12/21	Communications with insurer counsel re meet-and-confers.	.80	540.00
Rush, M.	11/12/21	Review document review memoranda.	1.00	675.00
Johnson, K.	11/12/21	Review plaintiffs' responses to Insurer #24.	.10	23.00
Gaske, A.	11/12/21	Confer with P. Breene, A. Crawford, R. Leveridge, J. Hudson, and J. Rubinstein re response to letter from National Union.	.50	287.50
Gaske, A.	11/12/21	Review letter from National Union and related discovery responses.	.50	287.50
Leveridge, R.	11/12/21	Analyze defensive discovery issues (1.2); confer with Debtors' counsel re same (0.7).	1.90	2,660.00
Leveridge, R.	11/12/21	Analyze summary judgment motions practice and offensive discovery.	1.30	1,820.00
Leveridge, R.	11/12/21	Communicate with team re ESI vendor retention.	.40	560.00
Leveridge, R.	11/12/21	Confer with co-counsel for AHC re proof of claim information and usefulness in proving coverage claims.	.90	1,260.00
Ogrey, S.	11/12/21	Organize materials for Akin Gump review re KCIC language report.	1.10	253.00
Carey, C.	11/12/21	Review Issue #32 materials and summary memorandum.	2.60	1,105.00
Sraders, S.	11/12/21	Review response letter from Insurers #9 and #23.	.20	115.00
Sraders, S.	11/12/21	Draft memorandum re Issue #56.	4.60	2,645.00
Sraders, S.	11/12/21	Revise chart summarizing reports re Issue #58.	.60	345.00
McGlinchey, P.	11/12/21	Review Debtors' and insurer policy comparison for certain insurers.	1.90	437.00
Kaminsky, E.	11/12/21	Research memorandum re Issue #54.	2.40	1,200.00
Lloyd, M.	11/12/21	Review Debtors' and insurer policy comparison for certain insurers.	2.10	409.50
Hubbard, B.	11/12/21	Confer with G. Cicero, J. Rubinstein, J. Hudson, R. Leveridge, and M. Rush re proofs of claim data.	1.10	467.50

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Name	Date	Services	Hours	Amount
Hubbard, B.	11/12/21	Confer with J. Hudson re prior analyses performed related to governmental claims.	.40	170.00
Hubbard, B.	11/12/21	Draft notes from call with G. Cicero.	2.50	1,062.50
Hudson, J.	11/13/21	Confer with co-plaintiffs' counsel (A. Crawford) re insurance recovery strategy.	.30	217.50
Sraders, S.	11/13/21	Revise chart summarizing reports re Issue #58.	.90	517.50
Rubinstein, J.	11/14/21	Correspond with A. Gaske and R. Shore re policy stipulation project (0.2); review charts re same (0.2); correspond with R. Shore and R. Leveridge re strategy (0.2).	.60	480.00
Gaske, A.	11/14/21	Research Issue #27 in certain jurisdictions.	2.80	1,610.00
Shore, R.	11/15/21	Review motion for summary judgment strategy (2.3); confer with team re same (1.5).	3.80	5,130.00
Shore, R.	11/15/21	Review and provide comments on section of Debtors' reply brief re insurance and AHC insert re same (1.5); confer with Chubb re objections and potential resolutions (0.6).	2.10	2,835.00
Hudson, J.	11/15/21	Revise proposed vendor agreement for hosting of Ad Hoc Committee materials.	.30	217.50
Rubinstein, J.	11/15/21	Confer with R. Leveridge, R. Shore, M. Rush, S. Srades and A. Gaske re motions strategy (1.5); communicate with A. Gaske re legal research (0.2); analysis re affirmative case strategy (2.1); review insurer meet-and-confer scheduling (0.2); analysis re policy stipulation issues (0.2); review research memoranda re multiple legal issues (2.1).	6.30	5,040.00
Rush, M.	11/15/21	Confer with team re motion for summary judgment strategy.	1.50	1,012.50
Gaske, A.	11/15/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, M. Rush, and S. Sraders re potential motions.	1.50	862.50
Gaske, A.	11/15/21	Draft portion of memorandum on Issue #27.	1.50	862.50
Gaske, A.	11/15/21	Communicate with R. Shore and J. Rubinstein re policy comparison.	.10	57.50
Leveridge, R.	11/15/21	Analyze strategy re motions for partial summary judgment.	.40	560.00
Leveridge, R.	11/15/21	Confer with team re anticipated motions practice (1.5); review status of research review research memoranda (0.7).	2.20	3,080.00
Ogrey, S.	11/15/21	Review and organize remaining KCIC language reports re Bermuda coverage, CGL occurrence coverage, D&O coverage, and Rhodes products coverage.	1.40	322.00
Carey, C.	11/15/21	Analyze Issue #32 materials and case strategy.	4.90	2,082.50

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Name	Date	Services	Hours	Amount
Sraders, S.	11/15/21	Review policy language re Issue #44.	.30	172.50
Sraders, S.	11/15/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, M. Rush, and A. Gaske re upcoming motion practice.	1.50	862.50
Sraders, S.	11/15/21	Revise draft memorandum re Issue #3.	.30	172.50
Sraders, S.	11/15/21	Revise draft chart summarizing reports re Issue #58.	1.00	575.00
Hubbard, B.	11/15/21	Review week-to-week changes in proofs of claim data and document same.	2.40	1,020.00
Shore, R.	11/16/21	Confer with J. Rubinstein and A. Gaske re policy stipulations (1.5); confer with team re potential motion for summary judgment re non-batch BF coverage (0.8); analyze same (0.5).	2.80	3,780.00
Hudson, J.	11/16/21	Analyze batch-related language and course of dealing for various policies.	.80	580.00
Rubinstein, J.	11/16/21	Review policy comparison binders re stipulation project (1.3); confer with R. Shore and A. Gaske re same focusing on NAE/Aspen policies (1.5); revise response to November 4 letter from J. Davis re discovery (0.9); confer with R. Shore and S. Sraders re potential motion (0.8); review National Union production cover letter (0.2); review deficiency letter to insurers in preparation for multiple meet-and-confers with insurers re discovery deficiencies (0.2).	4.90	3,920.00
Rush, M.	11/16/21	Communications with team re preparation for meet-and-confer sessions with insurers.	1.60	1,080.00
Rush, M.	11/16/21	Research re Issue #14.	.40	270.00
Gaske, A.	11/16/21	Confer with J. Rubinstein and R. Shore re review of discrepancies in policy versions of Insurers #9 and #23.	1.50	862.50
Gaske, A.	11/16/21	Review necessary documents in preparation for policy comparison session.	.30	172.50
Gaske, A.	11/16/21	Revise policy comparison spreadsheet for Insurer #9 and #23 pursuant to R. Shore and J. Rubinstein comments.	1.00	575.00
Leveridge, R.	11/16/21	Review communications with opposing counsel and co-counsel re offensive and defensive discovery issues.	.90	1,260.00
Ogrey, S.	11/16/21	Review and organize materials for meet-and-confer with insurers, including requests for production and interrogatories, and summaries re document production.	1.20	276.00
Carey, C.	11/16/21	Research Issue #32 case precedent.	4.20	1,785.00

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Name	Date	Services	Hours	Amount
Carey, C.	11/16/21	Revise Issue #32 memorandum.	2.50	1,062.50
Sraders, S.	11/16/21	Confer with R. Shore and J. Rubinstein re Issue #44.	.80	460.00
Sraders, S.	11/16/21	Draft memorandum re upcoming motion re Issue #44.	1.90	1,092.50
Sraders, S.	11/16/21	Review legal research re Issue #44.	.20	115.00
Sraders, S.	11/16/21	Review policies and correspondence re Issue #44.	2.80	1,610.00
Kaminsky, E.	11/16/21	Continue researching Issue #53.	2.80	1,400.00
Shore, R.	11/17/21	Confer with team re litigation next steps (0.4); review TIG letter and provide comments re same (0.2); review letter to J. Davis and provide brief comments (0.3).	.90	1,215.00
Hudson, J.	11/17/21	Confer with team re status of litigation.	.40	290.00
Hudson, J.	11/17/21	Revise response to second set of interrogatories from Navigators.	.10	72.50
Rubinstein, J.	11/17/21	Revise NAE/Aspen policy comparison charts (1.3); communications with A. Gaske and R. Shore re policy stipulation project (0.4); confer with team re strategy (0.4); communicate with M. Rush re governmental claims (0.2); review insurer deficiency issues in preparation for meet-and-confer discussions (0.3); analysis re certain Bermuda form policies (1.2); revise correspondence to co-plaintiff counsel re strategy (0.4); communicate with J. Hudson re edits to pending discovery responses (0.1); review Debtors' production letter (0.1); communication with Debtors' coverage counsel re strategy (0.3); review correspondence from TIG counsel re arbitration schedule (0.2); revise response to November 15 letter from J. Davis re discovery (0.6).	5.50	4,400.00
Rush, M.	11/17/21	Review deficiency letter responses and discovery in preparation for meet-and-confers with insurers.	2.60	1,755.00
Rush, M.	11/17/21	Draft potential motion re Issue #14.	2.80	1,890.00
Johnson, K.	11/17/21	Review and organize CGL policy data in preparation for creation of policy charts.	4.90	1,127.00
Johnson, K.	11/17/21	Communicate with S. Ogrey, S. Martinez, and L. Fastenau re meet-and-confer schedule.	.10	23.00
Johnson, K.	11/17/21	Revise Insurer #24 document collection and production Index.	.30	69.00
Gaske, A.	11/17/21	Revise Insurers #9 and #23 policy comparison spreadsheet re proposed treatment of discrepancies.	.40	230.00

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Name	Date	Services	Hours	Amount
Gaske, A.	11/17/21	Confer with S. Ogrey and L. Fastenau re review policies for certain language (0.3); review argument for potential motion on Issue #27 (1.7).	2.00	1,150.00
Leveridge, R.	11/17/21	Review and revise letter to opposing counsel re defensive discovery.	1.10	1,540.00
Leveridge, R.	11/17/21	Communicate with co-counsel re strategy for motion practice (0.4); analyze same (0.8).	1.20	1,680.00
Leveridge, R.	11/17/21	Review discovery issues in preparation for meet-and-confers with insurers re offensive discovery.	.70	980.00
Leveridge, R.	11/17/21	Review communication from TIG counsel re arbitration (0.2); communications with Debtors' counsel re same (0.4).	.60	840.00
Ogrey, S.	11/17/21	Draft Bermuda, CGL, and Rhodes coverage charts re those policies listed in Exhibit A to complaint.	2.70	621.00
Ogrey, S.	11/17/21	Confer with A. Gaske and L. Fastenau re review of non-Bermuda policies for products-completed operations hazard language.	.60	138.00
Ogrey, S.	11/17/21	Draft instructions and template re review of non-Bermuda policies for products-completed operations hazard language.	.50	115.00
Fastenau, L.	11/17/21	Review and organize most recent proofs of claim report for attorney review.	.40	126.00
Carey, C.	11/17/21	Continue researching Issue #32 case precedent.	3.10	1,317.50
Carey, C.	11/17/21	Revise Issue #32 memorandum.	3.20	1,360.00
Sraders, S.	11/17/21	Confer with J. Rubinstein re analysis of Bermuda form policies.	.20	115.00
Sraders, S.	11/17/21	Review document production from National Union.	.10	57.50
Sraders, S.	11/17/21	Draft memorandum re viability of motion re Issue #44.	4.70	2,702.50
Kaminsky, E.	11/17/21	Continue researching Issue #53.	1.60	800.00
Shore, R.	11/18/21	Conference call with co-plaintiffs' counsel re potential summary judgment motions and TIG (0.5); review J. Hudson summary re National Union policy period (0.2); review A. Gaske email re products hazard issue (0.3); review discovery responses and comment on same (1.9).	2.90	3,915.00
Shore, R.	11/18/21	Confer with team re litigation status and strategy.	1.10	1,485.00
Hudson, J.	11/18/21	Confer with litigation team re adversary proceeding strategy.	1.10	797.50
Hudson, J.	11/18/21	Confer with J. Davis re resolving policy period dispute without prejudice.	.10	72.50
Hudson, J.	11/18/21	Analyze process for finalizing re resolving policy period dispute without prejudice.	.10	72.50

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Name	Date	Services	Hours	Amount
Girgenti, J.	11/18/21	Confer with team re case status and strategy.	1.10	401.50
Rubinstein, J.	11/18/21	Review correspondence to insurer counsel (0.2); draft litigation to-do list (1.2); analysis re proofs of claim (0.3); confer with Debtors' insurance counsel re strategy (0.5); meet-and-confer with National Union re insurer discovery deficiencies (1.1); confer with M. Rush and R. Leveridge re outcome of meet-and-confer discussion (0.3); confer with team re strategy (1.1); communicate with NAE/Aspen counsel re policy stipulation (0.4); review draft letter to insurer counsel re plaintiffs' productions and provide comments to Debtors' counsel (0.5); confer with Debtors' insurance counsel and team re TIG correspondence (0.7); review issues and materials in preparation for meet-and-confer scheduled for November 19 (0.5); revise correspondence to UCC counsel (0.2); review edits to vendor engagement letter (0.2).	7.20	5,760.00
Rush, M.	11/18/21	Draft potential motion re Issue #14.	.40	270.00
Rush, M.	11/18/21	Confer with co-counsel re strategy.	.50	337.50
Rush, M.	11/18/21	Meet-and-confer with counsel for Liberty re discovery.	1.50	1,012.50
Rush, M.	11/18/21	Review deficiency letter responses and discovery in preparation for meet-and-confers with insurers.	2.90	1,957.50
Rush, M.	11/18/21	Confer with team re case status and strategy.	1.10	742.50
Martinez, S.	11/18/21	Confer with M. Rush, J. Hudson, C. Carey, J. Rubinstein, A. Gaske, J. Girgenti, R. Leveridge, R. Shore, B. Hubbard, I. Agwu, K. Johnson, and A. Bonesteel re case strategy and updates.	1.10	346.50
Johnson, K.	11/18/21	Review and organize Insurer #24 correspondence.	.10	23.00
Johnson, K.	11/18/21	Confer with R. Leveridge, J. Hudson, J. Rubinstein, R. Shore, M. Rush, J. Girgenti, C. Carey, A. Gaske, I. Agwu, B. Hubbard, A. Bonesteel, and S. Martinez re status and strategy.	1.10	253.00
Johnson, K.	11/18/21	Organize CGL and Bermuda policy data (1.1); draft CGL and Bermuda policy charts (3.1).	4.20	966.00
Bonesteel, A.	11/18/21	Review letter to counsel re production errors.	.40	150.00
Bonesteel, A.	11/18/21	Confer with team re status and strategy.	1.10	412.50
Gaske, A.	11/18/21	Confer with team re strategy and case updates.	1.10	632.50
Gaske, A.	11/18/21	Review policy version comparison charts for Insurer #33 re treatment of discrepancies.	.60	345.00
Gaske, A.	11/18/21	Draft high-level argument of Issue #27 re potential motion.	3.70	2,127.50
Gaske, A.	11/18/21	Research Issue #45 re potential motion.	1.50	862.50

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Name	Date	Services	Hours	Amount
Gaske, A.	11/18/21	Review team comments re response letter to National Union letter.	.10	57.50
Gaske, A.	11/18/21	Revise policy version comparison spreadsheet re treatment of discrepancies.	.60	345.00
Leveridge, R.	11/18/21	Revise letter to J. Davis re defensive discovery (1.3); communicate with co-counsel re same (0.3); review additional defensive discovery issues (0.3).	1.90	2,660.00
Leveridge, R.	11/18/21	Meet-and-confer with Liberty re discovery (1.5); communications with team re same (0.1).	1.60	2,240.00
Leveridge, R.	11/18/21	Review status of pending adversary proceeding (0.6); confer with team re same (1.1).	1.70	2,380.00
Leveridge, R.	11/18/21	Communications with Debtors' counsel and UCC counsel re motions being considered (0.8); communications with Debtors' counsel re TIG (0.6).	1.40	1,960.00
Fastenau, L.	11/18/21	Attend meet-and-confer with Liberty re discovery.	1.10	346.50
Carey, C.	11/18/21	Confer with team re case status and strategy.	1.10	467.50
Kaminsky, E.	11/18/21	Revise Issue #55 memorandum.	2.60	1,300.00
Hubbard, B.	11/18/21	Draft notes re proofs of claim data next steps for review (0.6); cursory review of opioid product names mentioned in proofs of claim data (1.6); prepare database for proofs of claim data for additional searching abilities (2.0).	4.20	1,785.00
Hubbard, B.	11/18/21	Meet with M. Rush, J. Rubinstein, J. Hudson, I. Agwu, K. Johnson, J. Girgenti, S. Martinez, R. Leveridge, C. Carey, A. Bonesteel, A. Gaske, and R. Shore re status and strategy.	1.10	467.50
Agwu, I.	11/18/21	Meet with team re case update.	1.10	220.00
Shore, R.	11/19/21	Confer with J. Rubinstein and A. Gaske re policy analysis (2.1); confer with R. Leverage, J. Rubinstein, and A. Gaske re non-products issue (0.9); review discovery issues (0.7).	3.70	4,995.00
Hudson, J.	11/19/21	Revise discovery responses.	.50	362.50
Girgenti, J.	11/19/21	Review and issue tag National Union supplemental document production for relevance and responsive documents.	3.40	1,241.00
Girgenti, J.	11/19/21	Draft insurance summary re review of National Union insurance production.	.60	219.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	11/19/21	Review correspondence re vendor retention (0.1); revise interrogatory responses (0.7); participate in meet-and-confer with AIGLIC (0.7); communicate with M. Rush re same (0.1); participate in meet-and-confer with XL counsel (0.5); confer with A. Gaske and R. Shore re policy stipulation comparison analysis re XL and Zurich policies (2.1); confer with R. Leveridge, R. Shore, and A. Gaske re Issue #27 (0.9); participate in meet-and-confer re Navigators production (0.5); participate in meet-and-confer with plaintiffs' counsel document vendors re production issues (0.5); participate in meet-and-confer with Gulf/St. Paul counsel (0.7); participate in meet-and-confer with NAE/Aspen counsel (0.9).	7.70	6,160.00
Rush, M.	11/19/21	Review materials in preparation for meet-and-confer with various insurers.	1.90	1,282.50
Rush, M.	11/19/21	Meet-and-confer with Zurich re discovery.	.70	472.50
Rush, M.	11/19/21	Meet-and-confer with XLIA re discovery.	.50	337.50
Rush, M.	11/19/21	Draft potential motion re Issue #14.	.50	337.50
Rush, M.	11/19/21	Meet-and-confer with Navigators re discovery.	.50	337.50
Rush, M.	11/19/21	Meet-and-confer with Gulf/St. Paul re discovery.	.70	472.50
Rush, M.	11/19/21	Meet-and-confer with NAE/Aspen discovery.	.90	607.50
Johnson, K.	11/19/21	Review and organize plaintiffs' correspondence to Insurer #24.	.10	23.00
Johnson, K.	11/19/21	Organize CGL and Bermuda policy data (0.2); draft CGL and Bermuda policy charts (2.8).	3.00	690.00
Johnson, K.	11/19/21	Attend meet-and-confer with Navigators re discovery.	.50	115.00
Johnson, K.	11/19/21	Attend meet-and-confer with Gulf/St. Paul re discovery.	.70	161.00
Johnson, K.	11/19/21	Attend meet-and-confer with Insurers NAE/Aspen re discovery.	.90	207.00
Johnson, K.	11/19/21	Draft memorandum re summary of meet-and-confer with Gulf/St. Paul.	1.80	414.00
Johnson, K.	11/19/21	Draft memorandum re summary of meet-and-confer with Navigators.	1.50	345.00
Johnson, K.	11/19/21	Draft memorandum re summary of meet-and-confer with Insurers NAE/Aspen.	1.40	322.00
Gaske, A.	11/19/21	Confer with J. Rubinstein and R. Shore re analysis of discrepancies in policy versions of Insurers #5 and #33 re potential policy stipulation.	2.10	1,207.50
Gaske, A.	11/19/21	Confer with R. Shore, R. Leveridge, and J. Rubinstein re potential motion on Issue #27.	.90	517.50

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Gaske, A.	11/19/21	Communicate with R. Shore and J. Rubinstein re argument for potential motion on Issue #27.	1.40	805.00
Leveridge, R.	11/19/21	Review discovery issues in preparation for meet-and-confers with insurers (1.0); meet-and-confer with Zurich re discovery (0.7); meet-and-confer with XL re discovery (0.5); meet-and-confer with Navigators re discovery (0.5); meet-and-confer with Gulf/St. Paul re discovery (0.7); meet-and-confer with NAE/Aspen re discovery (0.9).	4.30	6,020.00
Leveridge, R.	11/19/21	Confer with team re potential motions strategy (0.9); communications with counsel for UCC re same (0.4).	1.30	1,820.00
Ogrey, S.	11/19/21	Review Zurich and XLIA letters re discovery production sent on Nov. 08 to prepare for meet-and-confer calls.	.30	69.00
Ogrey, S.	11/19/21	Attend meet-and-confer with Zurich and M. Rush re discovery responses and discrepancies.	.70	161.00
Ogrey, S.	11/19/21	Attend meet-and-confer with XLIA and M. Rush re discovery responses and discrepancies.	.50	115.00
Ogrey, S.	11/19/21	Draft summary of meet-and-confer with Zurich re discovery responses and discrepancies.	2.70	621.00
Ogrey, S.	11/19/21	Draft summary of meet-and-confer with XLIA re discovery responses and discrepancies.	2.80	644.00
Fastenau, L.	11/19/21	Draft memorandum re Liberty meet-and-confer.	2.40	756.00
Kaminsky, E.	11/19/21	Research Issue #2.	1.80	900.00
Hudson, J.	11/21/21	Revise responses to Navigators' second set of interrogatories.	.80	580.00
Rubinstein, J.	11/21/21	Correspond with R. Shore and A. Gaske re NAE/Aspen policy stipulation (0.2); communication with R. Shore and R. Leveridge re post-MDT effective date cooperation from Debtors (0.2); correspond with J. Hudson re edits to discovery responses (0.4).	.80	640.00
Leveridge, R.	11/21/21	Communications with team re status of edits to discovery responses (0.3); review and comment on proposed edits to discovery responses (0.6).	.90	1,260.00
Shore, R.	11/22/21	Confer with E. Kaminsky re research.	.50	675.00
Shore, R.	11/22/21	Confer with J. Rubinstein and A. Gaske re policy review.	1.50	2,025.00
Hudson, J.	11/22/21	Analyze prior summaries of policy language in connection with potential motions practice.	.10	72.50
Hudson, J.	11/22/21	Confer with co-plaintiffs' counsel for the UCC (A. Vinson Crawford) re subject policy language.	.20	145.00

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Name	Date	Services	Hours	Amount
Hudson, J.	11/22/21	Draft supplemental responses to requests for admission.	.30	217.50
Hudson, J.	11/22/21	Confer with Debtors (A. Crawford) re responses to second set of interrogatories from Navigators.	.40	290.00
Rubinstein, J.	11/22/21	Correspond with A. Gaske re NAE/Aspen policy stipulation (0.1); communicate with team re request for admissions responses (0.2); analysis re premiums (0.2); review production letter to insurers providing finance, law, and risk employee information (0.2); correspond with team re government claims (0.2); review status of vendor retention agreement (0.2); confer with A. Gaske and R. Shore re policy comparison analysis (1.5); coordinate meet-and-confer with Gulf/St. Paul counsel re policy stipulation (0.2); participate in meet-and-confer with National Union re insurer discovery deficiencies (0.8); analysis re motions practice (0.6); analyze next steps re insurer meet-and-confers (0.8); correspond with co-plaintiff counsel re discovery responses (0.1); communicate with I. Agwu re research project (0.2); review correspondence from A. Fleischer re discovery meet-and-confer (0.2); review correspondence from National Union counsel (0.1); review correspondence to TIG counsel (0.1).	5.70	4,560.00
Rush, M.	11/22/21	Review summaries of meet-and-confer calls.	.20	135.00
Rush, M.	11/22/21	Draft motion re Issue #14.	3.00	2,025.00
Rush, M.	11/22/21	Review deficiency letter response and discovery in preparation for meet-and-confer with National Union.	.40	270.00
Rush, M.	11/22/21	Meet-and-confer with National Union re discovery.	1.50	1,012.50
Martinez, S.	11/22/21	Attend meet-and-confer with J. Fitzmaurice (National Union) and M. Rush re November 8, 2021 deficiency letter.	1.50	472.50
Martinez, S.	11/22/21	Revise and revise memorandum summarizing November 8, 2021 meet-and-confer with National Union.	.30	94.50
Martinez, S.	11/22/21	Review National Union discovery deficiency correspondence in preparation of November 22, 2021 meet-and-confer re same.	1.00	315.00
Johnson, K.	11/22/21	Revise memorandum re summary of meet-and-confer with Navigators.	.60	138.00
Johnson, K.	11/22/21	Revise memorandum re summary of meet-and-confer with Gulf/St. Paul.	.50	115.00

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Name	Date	Services	Hours	Amount
Johnson, K.	11/22/21	Revise memorandum re summary of meet-and-confer with NAE/Aspen.	.50	115.00
Johnson, K.	11/22/21	Review relevant data (1.3); draft Bermuda policy chart (1.6).	2.90	667.00
Gaske, A.	11/22/21	Review Insurers #15, #24, and #27 policies prior.	.70	402.50
Gaske, A.	11/22/21	Draft portion of potential motion on Issue #27.	.90	517.50
Gaske, A.	11/22/21	Communicate with team re tracking certain language in policies.	.20	115.00
Gaske, A.	11/22/21	Confer with R. Shore and J. Rubinstein re policy version comparison for policies issued by Insurer #24.	1.50	862.50
Leveridge, R.	11/22/21	Analyze status of offensive and defensive discovery tasks.	2.30	3,220.00
Leveridge, R.	11/22/21	Finalize vendor contract with Cobra for ESI services.	.60	840.00
Ogrey, S.	11/22/21	Revise draft of meet-and-confer summary re Zurich.	.30	69.00
Ogrey, S.	11/22/21	Revise draft of meet-and-confer summary re XLIA.	.60	138.00
Fastenau, L.	11/22/21	Draft tracking sheet for policy language related to exhaustion of underlying limits.	1.80	567.00
Sraders, S.	11/22/21	Confer with plaintiffs and National Union re ongoing discovery and productions.	.70	402.50
Sraders, S.	11/22/21	Draft revised exhibit to complaint showing policies still at issue in litigation.	.80	460.00
Sraders, S.	11/22/21	Draft memorandum re potential motion re Issue #44.	3.90	2,242.50
Kaminsky, E.	11/22/21	Confer with R. Shore re research memorandum.	.50	250.00
Kaminsky, E.	11/22/21	Draft memorandum re Issue #1.	1.40	700.00
Shore, R.	11/23/21	Confer with J. Rubinstein and A. Gaske re policy stipulations.	1.10	1,485.00
Shore, R.	11/23/21	Confer with co-counsel re summary judgment motions (0.9); confer with J. Rubinstein re post-effective date issues (0.6).	1.50	2,025.00
Hudson, J.	11/23/21	Revise supplemental responses to requests for admission re notice.	2.40	1,740.00
Hudson, J.	11/23/21	Confer with J. Davis re potential approach to resolving policy period dispute.	.20	145.00
Hudson, J.	11/23/21	Analyze potential approaches to resolving policy period dispute with National Union.	.20	145.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	11/23/21	Analysis re potential motion re Issue #44 (0.8); confer with A. Gaske and R. Shore re policy comparisons for stipulation purposes (1.1); review correspondence with National Union counsel (0.2); review status of discovery collection for review (0.2); communicate with R. Shore and R. Leveridge re National Union policy period issue (0.3); confer with co-plaintiff counsel re strategy (0.9); confer with R. Shore re post-effective date issues (0.5); confer with I. Agwu re insurer specific research (0.5); review Debtors' production correspondence (0.2); analysis re National Union policy term issue (0.3); analysis re proofs of claim data (0.2).	5.20	4,160.00
Rush, M.	11/23/21	Confer with co-counsel re potential dispositive motions.	.90	607.50
Martinez, S.	11/23/21	Finalize memorandum of November 2, 2021 deficiency topics discussed.	2.30	724.50
Johnson, K.	11/23/21	Organize Rhodes policy chart data (0.5); draft Rhodes policy chart (1.5); revise Bermuda policy chart (4.7); confer with S. Sraders re coverage charts (0.3).	7.00	1,610.00
Gaske, A.	11/23/21	Confer with R. Shore and J. Rubinstein re policy comparison session for Insurers #15, #24, and #27.	1.10	632.50
Gaske, A.	11/23/21	Confer with UCC counsel (D. Windscheffel and A. Crawford), Debtors' insurance counsel (A. Kramer and P. Breene), R. Shore, R. Leveridge, J. Rubinstein, and M. Rush re strategy and potential adversary proceeding next steps.	.90	517.50
Gaske, A.	11/23/21	Review Insurers #15, #24, and #27 policies.	.90	517.50
Gaske, A.	11/23/21	Research re legal standard (1.4); draft potential motion re legal standard (2.3).	3.70	2,127.50
Leveridge, R.	11/23/21	Review communications with Debtors' counsel and opposing counsel re defensive discovery issues.	.60	840.00
Leveridge, R.	11/23/21	Review claims information.	1.10	1,540.00
Leveridge, R.	11/23/21	Confer with Debtors' counsel and UCC counsel re motions practice.	.90	1,260.00
Leveridge, R.	11/23/21	Communications with team re coverage and discovery issues.	.90	1,260.00
Leveridge, R.	11/23/21	Analyze research issues and strategy.	.80	1,120.00
Lopez, D.	11/23/21	Review and revise Bermuda policy chart.	1.00	230.00
Lopez, D.	11/23/21	Confer with K. Johnson re Bermuda policy chart revisions.	.50	115.00
Ogrey, S.	11/23/21	Continue drafting CGL coverage chart re those policies still in arbitration.	3.20	736.00

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Name	Date	Services	Hours	Amount
Fastenau, L.	11/23/21	Revise tracking sheet for policy language re exhaustion of underlying limits.	.70	220.50
Fastenau, L.	11/23/21	Review policy language re exhaustion of underlying limits.	1.20	378.00
Fastenau, L.	11/23/21	Confer with E. Kaminsky re policy language project.	.30	94.50
Sraders, S.	11/23/21	Confer with K. Johnson re coverage charts.	.30	172.50
Sraders, S.	11/23/21	Analyze coverage charts.	.40	230.00
Kaminsky, E.	11/23/21	Confer with paralegals re policy analysis.	.20	100.00
Kaminsky, E.	11/23/21	Research re Issue # 2.	1.20	600.00
Kaminsky, E.	11/23/21	Policy review re Issue #25.	.80	400.00
Hubbard, B.	11/23/21	Summarize prior analysis of proofs of claim data (0.5); review opioid manufacturer information (1.5).	2.00	850.00
Agwu, I.	11/23/21	Meet with J. Rubinstein re research project re insurer knowledge of opioid epidemic.	.50	100.00
Hudson, J.	11/24/21	Revise supplemental responses to requests for admission.	.70	507.50
Hudson, J.	11/24/21	Analyze potential approaches to resolving policy period dispute.	.90	652.50
Girgenti, J.	11/24/21	Communicate with R. Leveridge, J. Rubinstein, J. Hudson, R. Shore and M. Rush re question about National Union and Liberty policy coverage.	.10	36.50
Rubinstein, J.	11/24/21	Communication with R. Shore, R. Leveridge, J. Hudson, and E. Kaminsky re National Union policy period issue.	.80	640.00
Johnson, K.	11/24/21	Revise Bermuda and CGL policy charts.	1.50	345.00
Bonesteel, A.	11/24/21	Review Cobra engagement letter addendum.	.50	187.50
Gaske, A.	11/24/21	Research policy interpretation standard in certain jurisdictions re potential motion.	.80	460.00
Leveridge, R.	11/24/21	Communications with team re issues raised by National Union (0.8); review material re same (0.4).	1.20	1,680.00
Lopez, D.	11/24/21	Review and revise Bermuda policy chart.	1.10	253.00
Fastenau, L.	11/24/21	Review and organize most recent proofs of claim reports for attorney review.	.20	63.00
Sraders, S.	11/24/21	Confer with K. Johnson re coverage chart for GL policies.	.10	57.50
Kaminsky, E.	11/24/21	Communicate with R. Shore, R. Leveridge, and J. Hudson re National Union motion for more definite statement.	.60	300.00
Kaminsky, E.	11/24/21	Review policies re Issue #25 memorandum.	2.00	1,000.00
Rush, M.	11/25/21	Draft potential motion for summary judgment re Issue #14.	1.50	1,012.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	11/26/21	Revise notice re discovery responses (0.8); review plaintiffs' production cover correspondence (0.1); review proofs of claim submissions (0.6); review case law re Issue #13 (0.5); review Liberty documents (0.3).	2.30	1,840.00
Shore, R.	11/29/21	Revise slide deck re settlement (0.8); analyze summary judgment strategy (0.4); communicate with team re National Union issue (0.5).	1.70	2,295.00
Hudson, J.	11/29/21	Confer with counsel for National Union (J. Davis) re potential dismissal without prejudice.	.10	72.50
Hudson, J.	11/29/21	Confer with Debtors (Reed Smith) re potential resolution of National Union issue.	.40	290.00
Hudson, J.	11/29/21	Review motions strategy.	.50	362.50
Hudson, J.	11/29/21	Confer with B. Hubbard re use of proofs of claim and underlying data in coverage action.	1.10	797.50
Hudson, J.	11/29/21	Outline strategy-related points for litigation.	.20	145.00
Girgenti, J.	11/29/21	Communicate with R. Leveridge, J. Rubinstein, J. Hudson, R. Shore and M. Rush re responding to question about National Union and Liberty policy coverage.	.30	109.50
Girgenti, J.	11/29/21	Review and analyze documents produced by National Union, Liberty, and related parties to identify policy coverage periods and/or gaps.	1.30	474.50
Rubinstein, J.	11/29/21	Revise correspondence re edits to multiple sets of discovery responses (0.7); analysis re asserted affirmative defenses (0.4); revise communications re meet-and-confer correspondence (0.3); analysis re National Union policy period issue (0.2); confer with Debtors' counsel re same (0.4); analysis re proofs of claim (0.2); analysis re Issue #13 case law (1.5); review amended statement of work from document vendor (0.1); analysis re expert research (0.2).	4.00	3,200.00
Rush, M.	11/29/21	Communicate with R. Leveridge re meet-and-confers with insurers and next steps.	.30	202.50
Rush, M.	11/29/21	Draft potential motion for summary judgment re Issue #14.	3.10	2,092.50
Johnson, K.	11/29/21	Review docket re stipulation related to J. DelConte declaration.	.40	92.00
Johnson, K.	11/29/21	Review and organize batch occurrence notices by insurer.	2.80	644.00
Johnson, K.	11/29/21	Review and organize interrogatory responses to Insurer #25 (0.2); revise master substantive responses and objection spreadsheets (0.6).	.80	184.00

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Name	Date	Services	Hours	Amount
Bonesteel, A.	11/29/21	Review and finalize amendment to contract with Cobra Legal Solutions.	.30	112.50
Gaske, A.	11/29/21	Review copies of batch notices in response.	.20	115.00
Gaske, A.	11/29/21	Draft portion of potential motion on Issue #27 re legal section.	1.90	1,092.50
Gaske, A.	11/29/21	Review policy language re Issue #27 for potential motion.	1.10	632.50
Leveridge, R.	11/29/21	Confer with co-counsel re coverage issue (0.4); analyze issues re same (0.7).	1.10	1,540.00
Fastenau, L.	11/29/21	Prepare tracking sheet and materials re drug research.	.90	283.50
Sraders, S.	11/29/21	Draft letters to insurers re meet-and-confer.	1.30	747.50
Sraders, S.	11/29/21	Draft chart re Issue #58.	.60	345.00
Sraders, S.	11/29/21	Research re California law re Issue #20.	.90	517.50
Kaminsky, E.	11/29/21	Confer with Reed Smith re National Union motion for more definite statement.	.40	200.00
Hubbard, B.	11/29/21	Confer with J. Hudson re Issue #27 and related claim data strategy.	.50	212.50
Hubbard, B.	11/29/21	Continue analyzing opioid product manufacturer research.	1.80	765.00
Agwu, I.	11/29/21	Research re insurer statements or actions re opioid epidemic for upcoming depositions.	2.00	400.00
Shore, R.	11/30/21	Review and comment on requests for admissions responses re notice (5.2); communicate with team re same (0.7).	5.90	7,965.00
Hudson, J.	11/30/21	Analyze defensive discovery strategy.	.50	362.50
Hudson, J.	11/30/21	Confer with Cobra re AHC document review.	.30	217.50
Hudson, J.	11/30/21	Revise amended responses to requests for admissions re notice.	.40	290.00
Hudson, J.	11/30/21	Draft potential stipulation re National Union policy period.	.50	362.50
Rubinstein, J.	11/30/21	Analyze discovery strategy (1.0); review edits to Cobra statement of work (0.1); review correspondence with National Union and discovery responses in preparation for meet-and-confer (0.6); participate in meet-and-confer with National Union (0.4); communicate with M. Rush and R. Leveridge re motions practice (0.5); communicate with A. Gaske re same (0.4).	3.00	2,400.00
Rush, M.	11/30/21	Draft potential motion for summary judgment re issue #14.	6.70	4,522.50
Johnson, K.	11/30/21	Revise spreadsheet re JX documents re policy type.	.50	115.00

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Name	Date	Services	Hours	Amount
Bonesteel, A.	11/30/21	Meet with Cobra Legal Solutions re database for email review.	.30	112.50
Bonesteel, A.	11/30/21	Review and update production database.	1.30	487.50
Bonesteel, A.	11/30/21	Communicate with team re additional emails from custodian Brown Rudnick to add to database.	.30	112.50
Gaske, A.	11/30/21	Communicate with S. Sraders re completing exhibit A for potential motion on Issue #27.	.30	172.50
Gaske, A.	11/30/21	Review underlying opioid mass tort complaints.	.90	517.50
Gaske, A.	11/30/21	Review disclosure statement and plan (2.3); draft portion of facts section of potential motion (0.8).	3.10	1,782.50
Leveridge, R.	11/30/21	Analyze defensive discovery issues.	1.80	2,520.00
Leveridge, R.	11/30/21	Review materials in preparation for meet-and-confer with National Union (0.9); participate in meet-and-confer with National Union (0.4). communicate with co-counsel re same (0.3).	1.60	2,240.00
Fastenau, L.	11/30/21	Confer with B. Hubbard re drug research.	.60	189.00
Fastenau, L.	11/30/21	Research drug manufacturers and product information.	5.10	1,606.50
Carey, C.	11/30/21	Analyze materials and filings re Issue #32.	2.40	1,020.00
Sraders, S.	11/30/21	Analyze policy language re Issue #27.	3.70	2,127.50
Sraders, S.	11/30/21	Draft letter to insurers re meet-and-confer.	.20	115.00
Kaminsky, E.	11/30/21	Confer with vendor re document review.	.30	150.00
Kaminsky, E.	11/30/21	Draft research memorandum re Issue #53.	3.80	1,900.00
Kaminsky, E.	11/30/21	Draft review protocol re tagging and limiters for defensive discovery.	.30	150.00
Hubbard, B.	11/30/21	Confer with L. Fastenau re opioid product research.	.50	212.50
Hubbard, B.	11/30/21	Review opioid research performed by L. Fastenau.	.90	382.50
Agwu, I.	11/30/21	Research re insurer statements or actions relating to opioid epidemic for upcoming depositions.	3.50	700.00
<b>Project Total:</b>			<b>771.60</b>	<b>\$ 496,361.50</b>

**TOTAL CHARGEABLE HOURS** **1,054.40**

**TOTAL FEES** **\$ 732,359.00**

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## TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	44.30	1,700.00	75,310.00
Quinn, K.	5.70	1,100.00	6,270.00
Shore, R.	71.50	1,350.00	96,525.00
Holland, P.	1.90	290.00	551.00
Hudson, J.	55.00	725.00	39,875.00
Neely, M.	3.10	625.00	1,937.50
Girgenti, J.	14.30	365.00	5,219.50
Grim, E.	2.20	700.00	1,540.00
Rubinstein, J.	99.80	800.00	79,840.00
Wolf, D.	5.10	350.00	1,785.00
Wolf, D.	66.10	700.00	46,270.00
Frazier, H.	15.50	675.00	10,462.50
Rush, M.	74.70	675.00	50,422.50
Martinez, S.	14.40	315.00	4,536.00
Johnson, K.	79.30	230.00	18,239.00
Bonesteel, A.	7.10	375.00	2,662.50
Gaske, A.	80.90	575.00	46,517.50
Leveridge, R.	71.50	1,400.00	100,100.00
Lopez, D.	3.40	230.00	782.00
Ogrey, S.	23.80	230.00	5,474.00
Fastenau, L.	37.50	315.00	11,812.50
Carey, C.	76.60	425.00	32,555.00
Sraders, S.	80.50	575.00	46,287.50
Colcock, S.	6.90	330.00	2,277.00
McGlinchey, P.	3.90	230.00	897.00
Kaminsky, E.	51.50	500.00	25,750.00
Lloyd, M.	5.60	195.00	1,092.00
Turner, C.	13.20	195.00	2,574.00
Hubbard, B.	31.00	425.00	13,175.00
Agwu, I.	8.10	200.00	1,620.00
<b>TOTALS</b>	<b>1,054.40</b>		<b>\$ 732,359.00</b>

## TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	8.30	6,465.50
A004	Case Administration	8.10	1,590.00
A006	Employment / Fee Applications	1.90	551.00
A009	Meetings / Communications with AHC & Creditors	6.80	7,792.50
A015	Non-Working Travel (Billed @ 50%)	5.10	1,785.00
A019	Plan of Reorganization / Disclosure Statement	252.60	217,813.50
A020	Insurance Adversary Proceeding	771.60	496,361.50

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**EXPENSE DETAILS**

**E115: Deposition / Transcripts**

Date	Description	Task	Amount
9/01/21	Deposition / Transcript - Veritext – Hearing Transcription Services 9/1/2021	E115	262.80
	<b>Sub-Total of Expenses:</b>		<b>\$ 262.80</b>
	<b>TOTAL EXPENSES</b>		<b>\$ 262.80</b>
	<b>TOTAL FEES AND EXPENSES</b>		<b>\$ 732,621.80</b>